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= Comments during
Martell/Tighe Mtg
10/26/88

CONFIDENTIAL

1 STATE OF ILLINOIS)
2) SS:
3 COUNTY OF C O O K)

4 IN RE THE MATTER OF:

5 U.S. SCRAP CORPORATION
6 and NINTH AVENUE DUMP

US EPA RECORDS CENTER REGION 5



401337

7
8 The Unsworn Statement of STEVE MARTELL,
9 taken at Suite 930, 33 North Dearborn Street, Chicago,
10 Illinois, on Tuesday, the 24th day of May, A.D. 1988, at
11 the hour of 10:00 a.m.

12
13 APPEARANCES:

14 MR. EDWARD KOWALSKI
15 U.S. Environmental Protection Agency
16 Region Five
230 South Dearborn Street
Chicago, Illinois
17 appeared on behalf of the U.S. Environmental
Protection Agency;

18
19 COTSIRILOS, CROWLEY, STEPHENSON, TIGHE & STREICKER
Suite 930
33 North Dearborn Street
20 Chicago, Illinois
21 BY: MS. ANN C. TIGHE,
appeared on behalf of Steve Martell.

1 MS. TIGHE: This will be the statement provided by
2 Steve Martell recording information that he has.

3 Ed, do you want to say something?

4 MR. KOWALSKI: Yes. Mr. Martell's statement is
5 being taken pursuant to a subpoena that was issued by the
6 United States Environmental Protection Agency under CERCLA
7 as amended by CERA.

8 Counsel for Mr. Martell and I have
9 agreed to limit the scope of the questions put to
10 Mr. Martell; however, the statement is being taken without
11 waiving any right by the U.S. EPA to pursue further
12 information in the form of a statement or deposition at a
13 later date.

14 Mr. Martell's attorney has also
15 asserted Fifth Amendment claims, and it is our
16 understanding that neither she nor Mr. Martell are waiving
17 any rights to assert those claims in the future.

18 MS. TIGHE: That's correct.

19 STEVE MARTELL,

20 was examined and testified as follows:

21 EXAMINATION

22 by Ms. Tighe:

23 Q Now, Mr. Martell, is the -- is the
24 information that you are going to provide today true and

1 correct, to the best of your knowledge and recollection?

2 A Yes, it is.

3 MS. TIGHE: All right.

4 (A discussion was held
5 off the record.)

6 MS. TIGHE: Back on the record.

7 Q Mr. Martell, have you been made aware of
8 companies that have disposed of waste at the Ninth Avenue
9 site in Gary, Indiana and at the U.S. Scrap site in
10 Chicago?

11 A Yes, I have.

12 Q All right. Now, to your knowledge, over what
13 period of time was waste disposed of at the Ninth Avenue
14 site that you're aware of?

*thinks didn't
dispose there til
late '73 early '74
Brought it in '71*

15 A Oh, either about '71, 1971 until 1975.

16 Q Okay. And over what approximate period of
17 time was waste disposed of at the U.S. Scrap site that you
18 might be aware of?

19 A Approximately 1965 until some time around the
20 end of 1973 or the early part of '74.

21 Q Okay. So when you are providing information
22 today, is it fair to say that you're going to be talking
23 about the period of time of 1965 through 1975?

24 A Yes.

1 Q Okay. All right. Mr. Martell, do you know
2 whether A.E. Staley disposed of waste at the Ninth Avenue
3 site?

4 A Yes, I do.

5 Q Did they?

6 A Yes, they did.

7 Q All right. Now, do you know whether A.E.
8 Staley also disposed of waste at the U.S. Scrap site?

9 A Yes, they did.

10 Q And do you know the location or locations
11 where A.E. Staley generated wastes that were disposed of
12 at these two sites?

13 A I believe it's Maley Road in Lemont,
14 Illinois.

15 Q All right. What types of waste did A.E.
16 Staley generate that were disposed of at those two sites,
17 if you know?

18 A As best I can remember, it would be polymers
19 and chemicals.

20 Q And how often did A.E. Staley dispose of
21 waste at those two sites, if you know?

22 A Approximately one or two loads only.

23 Q Okay. Do you know an approximate time that
24 these one or two loads occurred?

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1 A Some time in '72.

2 MR. KOWALSKI: Off the record.

3 (A discussion was held.

4 off the record.)

5 MS. TIGHE: Q What do you mean by a "load"?

6 A A load is a semi-trailer load, and it could
7 be anything from 50 to 80 drums.

8 Q All right. When you say anything from 50 to
9 80 drums, was there any certain period of time when it
10 would be -- when a load would constitute a certain size
11 and then it changed at a later time?

12 A Yes, the 50 to 80 drums I was referring to
13 was in the Staley case. In the -- in 1965 until about
14 1970, a trailer might have held anywhere from, oh, 40
15 until about 70 drums.

16 Q Uh-huh.

17 A And then after 1970, it would be like from 50
18 drums until 80 drums.

19 Q Okay. Now, Mr. Martell, do you know whether
20 Abbott Laboratories disposed of waste at the Ninth Avenue
21 site?

22 A Yes, they did.

23 Q And do you know whether Abbott Laboratories
24 also disposed of waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q Do you know the location or locations where
3 Abbott Laboratories generated wastes that were disposed of
4 at those two sites?

5 A The location of the plant is at 14th and
6 Sheridan Road in North Chicago, Illinois.

7 Q All right. And do you know what types of
8 wastes Abbott Laboratories generated that were disposed of
9 at those two sites?

10 Q Pharmaceutical and biological chemicals,
11 solvents and acids.

12 Q And how often did Abbott Laboratories dispose
13 of waste at those two sites, if you know?

14 A Three to four semi-trailer loads a month.

15 Q And over what approximate period of time did
16 Abbott Laboratories dispose of waste at those two waste
17 sites?

18 A 1965 until some time in 1973.

19 Q All right. Do you know whether Active
20 Service Company disposed of wastes at the Ninth Avenue
21 site?

22 A I don't remember at this time.

23 Q Do you know whether Active Service Company
24 disposed of waste at the U.S. Scrap sites?

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1 A I don't remember at this time.

2 Q All right. Do you know whether Adolph
3 Plating disposed of waste at the Ninth Avenue site?

4 A I don't remember at this time.

5 Q Do you know whether Adolph Plating disposed
6 of waste at the U.S. Scrap site?

7 A I don't remember at this time.

8 Q Mr. Martell, do you know whether Alberto
9 Culver disposed of waste at the Ninth Avenue site?

10 A Yes, they did.

11 Q Do you know whether Alberto Culver also
12 disposed of waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Now, do you know the location or locations
15 where Alberto Culver generated wastes that were disposed
16 of at the two sites?

17 A 2525 Armitage Avenue, Melrose Park, Illinois.

18 Q How often did Alberto Culver dispose of waste
19 at those two sites, if you know?

20 A Two to three thousand gallons in a tanker a
21 month.

22 Q All right. And over what approximate period
23 of time did Alberto Culver dispose of waste at those
24 sites?

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1 A 1973 to 1974.

2 Q And Mr. Martell, do you know what types of
3 wastes Alberto Culver generated that were disposed of at
4 those sites?

5 A Machine wash solvents and oils.

6 Q All right. Mr. Martell, do you know whether
7 Alton Boxboard Company disposed of wastes at the Ninth
8 Avenue site?

9 A No, they didn't.

10 Q Do you know whether Alton Boxboard Company
11 disposed of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q And do you know the location or locations
14 where Alton Boxboard generated wastes that were disposed
15 of at the two sites -- at the one site, U.S. Scrap?

16 A The plant was located at 5025 West 65th
17 Street in Bedford Park, Illinois.

18 Q And what type of -- what types of waste did
19 Alton Boxboard Company generate that were disposed of at
20 the U.S. Scrap site?

21 A It was paint, ink, solvents and oils.

22 Q And if you know, how often did Alton Boxboard
23 Company dispose of waste at the U.S. Scrap site?

24 A Two to three trailer loads of drums a year.

1 Q All right. And over what approximate period
2 of time did Alton Boxboard dispose of waste at the U.S.
3 Scrap site?

4 A 1965 to 1967.

5 Q All right. Mr. Martell, do you know whether
6 American Can Company disposed of waste at the Ninth Avenue
7 site?

8 A They, they did.

9 Q Do you know whether American Can Company also
10 disposed of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Now, do you know the location or locations
13 where American Can Company generated wastes that were
14 disposed of at the two sites?

15 A Yes, I do.

16 Q What are those locations?

17 A They're four plants.

18 Q Okay.

19 A First plant is commonly called the Englewood
20 facility, and it's at 6017 South Western Avenue in
21 Chicago. Second plant is in Maywood, and it was at Ninth
22 Avenue and St. Charles Road in Maywood, Illinois before it
23 blew up. The next -- the third one is at -- is on 165th
24 Street in Hammond, Indiana, and I don't have the exact

1 address. And then the fourth plant is a research center
2 in Barrington, Illinois, and that address is 433 North
3 Northwest Highway.

4 Q In Barrington?

5 A Barrington, Illinois, yes, ma'am.

6 Q Okay. All right. Now, Mr. Martell, what
7 types of waste did American Can Company generate that were
8 disposed of at the two sites, and if you can -- if there
9 are different types of waste for the different locations
10 that you have just described, would you differentiate?

11 Q Well, as far as I can remember, it was all
12 the same. It might have been just a little different with
13 the research, but I don't think so. What I remember, it
14 was solvents, paints, varnishes, adhesives and oils.

15 Q All right. Now, how often did American Can
16 Company dispose of waste at the two sites, if you know?
17 And again, if you can differentiate among the locations,
18 that would be helpful.

19 A Okay. Englewood plant, four to five trailer
20 loads a month.

21 Q Over what period of time?

22 A 1965 to 1975.

23 Q All right.

24 A Maywood plant, one to two trailer loads a

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1 month.

2 Q Over what period of time?

3 A '65 till it exploded, and I don't remember
4 when that, what that year was, but it was either the late
5 '60s or the first year of '70. That's a guess.

6 Q All right.

7 A The third plant is the Hammond plant, and
8 that was 40 to 50 drums a month, and then later -- in the
9 early part, and then later on, it reverted to drums being
10 pumped into a tanker.

11 Q All right.

12 A And then years would be, on that one I'm not
13 sure of the start. I'm going to say it's about 1968 until
14 1975.

15 Q All right.

16 A Okay. The research center would be 20 do 40
17 drums, three or four times a year, and again, I don't know
18 for sure the start of that one. I would just know it
19 ended in '75. I don't know when the starting date is.

20 Q All right. And Mr. Martell, as we go along
21 and if there are things like this that you don't remember
22 or you're not sure of, please feel free to specify that
23 you, you know, you don't remember and you're not sure of
24 your information.

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1 A Okay.

2 Q Now, Mr. Martell, do you know whether
3 American Motor Company disposed of waste at the Ninth
4 Avenue site?

5 A Let's see. Yes, they did.

6 Q And do you know whether American Motor
7 Company also disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know the location or locations where
10 American Motor Company generated waste that were disposed
11 of at those two sites?

12 A The plant was in Kenosha, Wisconsin.

13 Q All right. Now, what types of waste did
14 American Motor Company generate that were disposed of at
15 the two sites?

16 A It was paint and solvents.

17 Q And how often did American Motor Company
18 generate wastes for those -- dispose of wastes at those
19 sites?

20 A There are were about four to five
21 semi-trailer loads total involved, and there was about 50
22 to 70 drums on a load.

23 Q All right. Over what period of time did
24 American Motor Company dispose of the waste that you've

1 described?

2 A 1971 to some time in 1973.

3 Q All right. Do you know whether American
4 Printers disposed of waste at the Ninth Avenue site?

5 A Yes, they did.

6 Q Do you know whether American Printers also
7 disposed of wastes at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know of the location or locations
10 where American Printers generated wastes that were
11 disposed of at the two sites?

12 A 6701 West Oakton Street, Niles, Illinois.

13 Q And if you know, what types of waste did
14 American Printers generate that were disposed of at the
15 two sites?

16 A Inks and solvents.

17 Q All right. And how often did American
18 Printers dispose of wastes at the two sites?

19 A Twenty-five to thirty drums every two or
20 three months.

21 Q And over what approximate period of time did
22 this disposal at the two sites occur?

23 A 1973 to 1975.

24 Q All right. Now, do you know whether Apeco

1 disposed of waste at the Ninth Avenue site?

2 A Yes, they did.

3 Q And do you know whether Apeco also disposed
4 of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you know the location or locations where
7 Apeco generated wastes that were disposed of at those two
8 sites?

9 A The plant was located at 2100 Dempster
10 Street, Evanston, Illinois.

11 Q How often did Apeco dispose -- strike that.

12 Do you know what types of wastes Apeco
13 generated that were disposed of at the two sites?

14 A Payments, ink, solvents, oils and chemicals.

15 Q All right. All right. And do you know
16 approximately how often Apeco disposed of waste at those
17 sites?

18 A Fifty to sixty drums a month.

19 Q And over what approximate period of time did
20 Apeco dispose of waste at those two sites?

21 A 1973 to 1975.

22 Q Mr. Martell, do you know whether Armour
23 disposed of waste at the Ninth Avenue site?

24 A No, they didn't.

1 Q Do you know whether Armour disposed of waste
2 at the U.S. Scrap site?

3 A Yes, they did, although -- can I say
4 something?

5 Q Mr. Martell, is -- to your knowledge, does
6 Armour have another name also?

7 A No --

8 Q Does it go by another name?

9 A I'm not sure it's really Armour. It's either
10 Armour or Wilson, and, you know, I'm not sure of the name
11 exactly.

12 Q Okay. This company, Armour, or Wilson, do
13 you know the location or locations where it generated
14 wastes that were disposed of at the U.S. Scrap site?

15 A Approximately 41st and Paulina Street in
16 Chicago, Illinois.

17 Q And what types of waste did Armour or Wilson
18 generate that were disposed of at the U.S. Scrap site?

19 A Rendering sludge.

20 Q And how often did Armour or Wilson dispose of
21 waste at that site, if you know?

22 A One to two tanker loads a week.

23 Q And over what approximate period of time did
24 that company dispose of the wastes at U.S. Scrap?

1 A 1966 to 1967 approximately.

2 MS. TIGHE: All right.

3 MR. KOWALSKI: Off the record.

4 (A discussion was held
5 off the record.)

6 MS. TIGHE: Q Mr. Martell, when you speak here
7 today of tanker loads, can you specify the -- what size
8 are you talking about?

9 A It -- they vary, so this in this case here,
10 it would be about 5000-gallon tankers.

11 Q And when you say "in this case," are we
12 talking about Armour or Wilson?

13 A Yes.

14 Q All right. Mr. Martell, do you know whether
15 Armstrong Paint disposed of waste at the Ninth Avenue
16 site?

17 A It's, you know, this is really Elliott, so
18 how do we handle that? Do you want me --

19 Q I'll bring that out. Let me rephrase the
20 question.

21 Do you know whether Armstrong Paint,
22 which is also maybe called Elliott Paint, disposed of
23 waste at the Ninth Avenue site?

24 A Yes, they did.

1 Q And do you know whether Armstrong Paint, also
2 called Elliott Paint, disposed of waste at the U.S. Scrap
3 site?

4 A It's backwards, backwards. I'm sorry. I
5 don't know how to do that. It's the U.S. Scrap site, not
6 the Ninth Avenue.

7 Q Did -- did Armstrong Paint, also known as
8 Elliott Paint, dispose of wastes only at one site,
9 Mr. Martell?

10 A Yes, they did.

11 Q What site was that?

12 A At the U.S. Scrap site.

13 Q Only at the U.S. Scrap site.

14 Now, do you know the location or
15 locations where Armstrong, Elliott Paint, generated wastes
16 that were disposed of at the U.S. Scrap site?

17 A 1330 South Kilbourn Avenue in Chicago.

18 Q All right. And what -- what types of waste
19 did Armstrong-Elliott generate that were disposed of at
20 the U.S. Scrap site?

21 A Paint, solvents and varnishes.

22 Q And how often did Armstrong-Elliott dispose
23 of waste at the U.S. Scrap site, if you know?

24 A One to two trailer loads of drums each month.

1 Q And over what approximate period of time did
2 Armstrong-Elliott dispose of waste at U.S. Scrap?

3 A 1965 to 1970.

4 Q All right. Mr. Martell, do you know whether
5 Ashland Chemical disposed of waste at the Ninth Avenue
6 site?

7 A Yes, they did.

8 Q Do you know whether Ashland Chemical also
9 disposed of waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q Do you know the location or locations where
12 Ashland Chemical generated wastes that were disposed of at
13 those two sites?

14 A The plant was located at 142nd Street and
15 Paxton Road in Calumet City, Illinois.

16 Q All right. And what -- what types of waste
17 did Armstrong -- did Ashland Chemical generate that were
18 disposed of at the two sites?

19 A Chemicals, resins, solvents, glues, and
20 adhesives.

21 Q And how often did Ashland Chemical dispose of
22 waste at the two sites, if you know?

23 A One to two trailer loads a month.

24 Q And over what approximate period of time did

1 Ashland Chemical dispose of waste at the site?

2 A 1969 to 1975.

3 Q All right. Mr. Martell, do you know whether

4 Barber-Green disposed of waste at the Ninth Avenue site?

5 A Yes, they did.

6 Q Do you know whether Barber-Green also

7 disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know the location or locations where

10 Barber-Green generated wastes that were disposed of at the

11 two sites?

12 A The plant was located in Aurora, Illinois.

13 Q All right. And what types of waste did

14 Barber-Green generate that were disposed of at the two

15 sites?

16 A Paint, solvents and oils.

17 Q And how often did Barber-Green dispose of

18 wastes at the two sites?

19 A One trailer load a month approximately.

20 Q And over what approximate period of time did

21 Barber-Green dispose of waste at those two sites?

22 A 1973 to 1975.

23 MS. TIGHE: Off the record.

24

1 (A discussion was held
2 off the record.)

3 MS. TIGHE: Q Mr. Martell, do you know whether
4 Bagcraft Corporation disposed of waste at the Ninth Avenue
5 site?

6 A Yes, they did.

7 Q Do you know whether Bagcraft Corporation also
8 disposed of waste at the U.S. Scrap site?

9 A Yes, they did.

10 Q Do you know the location or locations where
11 Bagcraft Corporation generated wastes that were disposed
12 of at the two sites?

13 A 3900 West 43rd Street, Chicago, Illinois.

14 Q And do you know what types of waste Bagcraft
15 Corporation generated that were disposed of at the two
16 sites?

17 A Paints, solvents, and adhesives.

18 Q How often did Bagcraft Corporation dispose of
19 waste at those sites, if you know?

20 A Trailer load of 50 to 60 drums every two or
21 three months.

22 Q All right. And over what approximate period
23 of time did Bagcraft Corporation dispose of waste at those
24 sites?

1 A 1970 and 1975.

2 Q Mr. Martell, do you know whether Barker
3 Chemical disposed of waste at the Ninth Avenue site?

4 A Yes, they did.

5 Q Do you know whether Barker Chemical also
6 disposed of wastes at the U.S. Scrap site?

7 A Yes, they did.

8 Q Now, do you know the location or locations
9 where Barker Chemical generated wastes that were disposed
10 of at the two sites?

11 A 700 East 138th Street, Chicago, Illinois.

12 Q And what types of waste did Barker Chemical
13 generate that were disposed of at those two sites?

14 A Solvents, chemicals and paints.

15 Q How often did Barker Chemical dispose of
16 those wastes at the two sites, if you know?

17 A One to two semi-trailer loads a month.

18 Q And over what approximate period of time did
19 Barker Chemical dispose of those wastes at the two sites?

20 A 1969-1975.

21 Q '69 to 1975?

22 A To 1975.

23 Q Mr. Martell, do you know whether Barrett
24 Varnish Company disposed of waste at the Ninth Avenue

1 site?

2 A Yes, they did.

3 Q Do you know whether Barrett Varnish Company
4 also disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you know the location or locations where
7 Barrett Varnish generated wastes that were disposed of at
8 the two sites?

9 A 1532 South 50th Court, Cicero, Illinois.

10 Q And what types of wastes did Barrett generate
11 that were disposed of at the two sites?

12 A Varnish and solvents.

13 Q How often did Barrett Varnish dispose of
14 waste at those two sites?

15 A A load of 30 to 50 drums three to four times
16 a year.

17 Q All right. And over what approximate period
18 of time did Barrett Varnish dispose of waste at those
19 sites?

20 A 1972 until 1975.

21 Q Mr. Martell, do you know whether Benjamin
22 Moore Company disposed of waste at the Ninth Avenue site?

23 A Yes, they did.

24 Q Do you know whether Benjamin Moore Company

1 also disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you know the location or locations where
4 Benjamin-generated wastes were disposed of at the two
5 sites?

6 A North Avenue and 25th Avenue in Melrose Park,
7 Illinois.

8 Q And what types of waste did Benjamin Moore
9 generate that were disposed of at the two sites?

10 A Paints, solvents, varnishes, oils and
11 coatings.

12 Q How often did Benjamin Moore dispose of waste
13 at those two sites, if you know?

14 A One to two trailer loads every couple of
15 months.

16 Q All right. And over what approximate period
17 of time did Benjamin Moore dispose of waste at two those
18 sites?

19 A 1968 until 1975.

20 Q Do you know whether Big Ben Chemicals
21 disposed of waste at the Ninth Avenue site?

22 A Let's see. No, they didn't.

23 Q Do you know whether Big Ben Chemicals
24 disposed of waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q Do you know the location or locations where
3 Big Ben Chemicals generated waste that were disposed of at
4 the two sites?

5 A Approximately 18th and LaSalle Street in
6 Chicago, Illinois.

7 Q All right. Now, what types of waste did Big
8 Ben Chemicals generate that were disposed of at the U.S.
9 Scrap site?

10 A Chemicals and solvents.

11 Q And how often did Big Ben Chemicals dispose
12 of waste at the U.S. Scrap site?

13 (A discussion was held
14 off the record.)

15 MS. TIGHE: All right. Back on the record.

16 Q How often -- I think to repeat the question,
17 Mr. Martell, if you know, how often did Big Ben Chemicals
18 dispose of waste at the U.S. Scrap site?

19 A Normally three to four, a trailer load three
20 to four times a year; however, they disposed of many loads
21 on moving from 18th Street to, I believe it was, Willow
22 Springs, Illinois, and that may have been as many as 10 to
23 20 trailer loads.

24 Q All right. And over what approximate period

1 of time did Big Ben Chemicals dispose of waste at the U.S.
2 Scrap site?

3 A 1968 to 1970.

4 Q All right. Mr. Martell, do you know whether
5 Blaw-Knox disposed of waste at the Ninth Avenue site?

6 A Yes, they did.

7 Q Do you know whether Blaw-Knox also disposed
8 of waste at the U.S. Scrap site?

9 A No, they didn't.

10 Q All right. Do you know the location or
11 locations where Blaw-Knox generated wastes that were
12 disposed of at the Ninth Avenue site?

13 A Chicago Avenue and Railroad Street in East
14 Chicago, Indiana.

15 Q And what types of waste did Blaw-Knox
16 generate that were disposed of at the Ninth Avenue site?

17 A Foundry, sand, anchor molds.

18 Q How often did Blaw-Knox dispose of waste at
19 the Ninth Avenue site?

20 A Five to ten truck loads a day.

21 Q And over what approximate period of time did
22 Blaw-Knox dispose of waste at that site?

23 A 1973 until 1975.

24 Q Mr. Martell, do you know whether Boyle-Midway

1 disposed of wastes at the Ninth Avenue site?

2 A Yes, they did.

3 Q Do you know whether Boyle-Midway also
4 disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you know the location or locations where
7 Boyle-Midway generated wastes that were disposed of at the
8 two sites?

9 A Not at this time.

10 Q All right. Does that mean you can't recall
11 at this time?

12 A Yeah, I can't recall at this time.

13 Q All right. Now, what types of waste did
14 Boyle-Midway generate that were disposed of at the two
15 sites?

16 A Solvents and chemicals.

17 Q How often did Boyle-Midway dispose of wastes
18 at those two sites, if you know?

19 A A load of 50 to 60 drums every two or three
20 months.

21 Q And over what approximate period of time did
22 this disposal occur?

23 A 1973 until some time in 1975.

24 Q All right. Mr. Martell, do you know whether

1 Brandenburg Wrecking Company disposed of waste at the
2 Ninth Avenue site?

3 A No, they didn't.

4 Q Do you know whether Brandenburg wrecking
5 disposed of waste at the U.S. Scrap site?

6 A Yes, they did.

7 Q Do you know the location where Brandenburg
8 Wrecking generated wastes that were disposed of at the
9 U.S. Scrap site?

10 A All over the city of Chicago.

11 Q All right. Now, what types of waste did
12 Brandenburg Wrecking generate that were disposed of at the
13 U.S. Scrap site?

14 A Building debris, concrete and wood only.

15 Q All right. How often did Brandenburg
16 Wrecking dispose of waste at the U.S. Scrap site?

17 A Every working day, more or less.

18 Q And would that be five days a week?

19 A Yes, ma'am.

20 Q Over what approximate period of time did
21 Brandenburg Wrecking dispose of wastes at U.S. Scrap?

22 A 1972 until 1973.

23 Q All right. Mr. Martell, do you know whether
24 Brett Ford Manufacturing disposed of waste at the Ninth

1 Avenue site?

2 A Yes, they did.

3 Q Do you know whether Brett Ford Manufacturing
4 also disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you know the location where Brett Ford
7 Manufacturing generated wastes that were disposed of at
8 those two sites?

9 A 3951 25th Avenue, Schiller Park, Illinois

10 Q And what types of waste did Brett Ford
11 Manufacturing generate that were disposed of at the two
12 sites?

13 A Solvents and paints.

14 Q How often did Brett Ford Manufacturing
15 dispose of waste at those two sites?

16 A A load of 40 to 60 drums every two or three
17 months.

18 Q And over what approximate period of time did
19 this disposal by Brett Ford Manufacturing occur?

20 A 1973 until some time in 1975.

21 Q Mr. Martell, do you know whether Brightly
22 Galvanized disposed of waste at the Ninth Avenue site?

23 A Yes, they did.

24 Q Do you know whether Brightly Galvanized also

1 disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you know the location or locations where
4 Brightly Galvanized generated waste that were disposed of
5 at the two sites?

6 A 3330 South Cicero Avenue, Cicero, Illinois.

7 Q And what types of waste did Brightly
8 Galvanized generate that were disposed of at the two
9 sites?

10 A Acid.

11 Q How often did Brightly Galvanized dispose of
12 waste at those two sites?

13 A Two or three times a month with a 4500 gallon
14 tanker.

15 Q And over what approximate period of time did
16 Brightly Galvanized dispose of these wastes?

17 A 1971 until some time in 1975.

18 Q All right. Mr. Martell, do you know whether
19 Boltmaster disposed of wastes at the Ninth Avenue site?

20 A Yes, they did.

21 Q Do you know whether Boltmaster also disposed
22 of waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you know the location where Boltmaster

1 generated wastes that were disposed of at the two sites?

2 A 7375 Chestnut Avenue, Franklin Park,
3 Illinois.

4 Q And what types -- off the record.

5 (A discussion was held
6 off the record.)

7 MS. TIGHE: Okay. Back on.

8 Q What types of wastes did Boltmaster generate
9 that were disposed of at the two sites?

10 A Oil and solvents.

11 Q And how often did Boltmaster dispose of waste
12 at those sites, if you know?

13 A A load of 40 to 50 drums two or three times a
14 year.

15 Q And over what approximate period of time did
16 Boltmaster dispose of these wastes at the two sites?

17 A 1973 until 1975.

18 Q Mr. Martell, do you know whether C.P. Clare
19 disposed of waste at the Ninth Avenue site?

20 A Yes, they did.

21 Q Do you know whether C.P. Clare also disposed
22 of waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you know the location where C.P. Clare

1 generated wastes that were disposed of at the two sites?

2 A 3101 West Pratt Boulevard, Chicago, Illinois.

3 Q And what types of waste did C.P. Clare
4 generate that were disposed of at the two sites, if you
5 know?

6 A Fifteen to twenty-five drums two or three --

7 Q Excuse me, Mr. Martell. I said what types of
8 waste.

9 A Acid.

10 Q Okay. Just for the record, Mr. Martell, do
11 you have a hearing problem?

12 A Yes, I do.

13 Q Okay. Are you wearing a hearing aid?

14 A One is out. Something is wrong with this
15 one. I need two, but only one is working.

16 Q All right. Now, approximately how often did
17 C.P. Clare dispose of waste at the two sites?

18 A Fifteen to twenty-five drums two or three
19 times a year.

20 Q And over what approximate period of time did
21 this disposal by C.P. Clare occur?

22 A 1973 until some time in 1975.

23 Q All right. Mr. Martell, do you know whether
24 C.P. Hall disposed of waste at the Ninth Avenue site?

1 A Yes, they did.

2 Q Do you know whether C.P. Hall also disposed
3 of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you know the location where C.P. Hall
6 generated wastes that were disposed of at the two sites?

7 A 7300 South Central Avenue, Chicago, Illinois.

8 Q What types of waste did C.P. Hall generate
9 that were disposed of at the two sites?

10 A Acids and chemicals.

11 Q And how often did C.P. Hall dispose of waste
12 at those sites?

13 A They disposed of 50 to 70 drums in a trailer
14 load every two or three months.

15 Q And over what approximate period of time did
16 C.P. Hall dispose of waste at those sites?

17 A 1973 until some time in 1975.

18 Q Mr. Martell, do you know whether Cargill,
19 Inc. disposed of wastes at the Ninth Avenue site?

20 A Yes, they did.

21 Q Do you know whether Cargill also disposed of
22 waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q What is the location where CP -- where

1 Cargill generated wastes that were disposed of at the two
2 sites?

3 A Cottage Avenue and Lake Marion Road,
4 Carpentersville, Illinois.

5 Q And what types of wastes did Cargill generate
6 that were disposed of at the two sites?

7 A Resins, solvents and chemicals.

8 Q How often did Cargill dispose of waste at
9 those sites, if you know?

10 A Two or three trailer loads of drums a month.

11 Q And over what approximate period of time did
12 Cargill dispose of waste at the two sites?

13 A 1971 until some time in 1975.

14 Q All right. Mr. Martell, do you know whether
15 Central Can Company company disposed of waste at the Ninth
16 Avenue site?

17 A I don't remember at this time.

18 Q Do you know whether Central Can Company
19 disposed of wastes at the U.S. Scrap site?

20 A I don't remember at this time.

21 Q All right. Mr. Martell, do you know whether
22 Central Solvents and Chemicals disposed of wastes at the
23 Ninth Avenue site?

24 A No, they didn't.

1 Q Do you know whether Central Solvents and
2 Chemicals disposed of waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you know the location where Central
5 Solvents and Chemicals generated wastes that were disposed
6 of at the U.S. Scrap site?

7 A 4401 West 26th Street, Chicago, Illinois.

8 Q And what types of waste did Central Solvents
9 and Chemicals generate that were disposed of at the U.S.
10 Scrap site?

11 A Solvents and chemicals.

12 Q How often did Central Solvents and Chemicals
13 dispose of waste at the U.S. Scrap site?

14 A As best as I can remember -- and we can, you
15 know, look it up -- it's about one to two loads only.

16 Q All right. And in what approximate period of
17 time did that disposal occur?

18 A Some time between 1967 and 1971.

19 Q All right. Mr. Martell, do you know whether
20 Chase Products or Chase Brass disposed of waste at the
21 Ninth Avenue site?

22 A I don't remember at this time.

23 Q Do you know whether Chase Products or Chase
24 Brass disposed of waste at the U.S. Scrap site?

1 A I don't remember at this time.

2 Q All right. Do you know whether Chicago Decal
3 disposed of waste at the Ninth Avenue site?

4 A Yes, they did.

5 Q Do you know whether Chicago Decal also
6 disposed of waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Mr. Martell, do you know the location where
9 Chicago Decal generated wastes that were disposed of at
10 those two sites?

11 A 3310 North Elston Avenue, Chicago, Illinois.

12 Q What types of waste did Chicago Decal
13 generate that were disposed of at the two sites, if you
14 know?

15 A Solvents, adhesives, inks, and paint.

16 Q How often did Chicago Decal dispose of wastes
17 at the two sites?

18 A Thirty to forty drums every four to five
19 months.

20 Q And over what approximate period of time did
21 Chicago Decal dispose of these wastes at the two sites?

22 A Some time in 1969 until some time in 1975.

23 Q Do you know whether Chicago Name Plate
24 disposed of wastes at the Ninth Avenue site?

1 A Yes, they did.

2 Q Do you know whether Chicago Name Plate also
3 disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Now, do you know the location where Chicago
6 Name Plate generated wastes that were disposed of at the
7 two sites?

8 A 1831 West Columbia Avenue, Chicago, Illinois.

9 Q And what types of waste did Chicago Name
10 Plate generate that were disposed of at the two sites?

11 A Acid, solvents and paints.

12 Q And how often did Chicago Name Plate dispose
13 of wastes at the two sites?

14 A Forty to sixty drums three or four times a
15 year.

16 Q And over what approximate years did Chicago
17 Name Plate dispose of these wastes?

18 A 1972 until some time in 1975.

19 Q All right. Mr. Martell, do you know whether
20 the Chicago Northwestern Railroad disposed of waste at the
21 Ninth Avenue site?

22 A Yes, they did.

23 Q Do you know whether the Chicago and
24 Northwestern Railroad also disposed of waste at the U.S.

1 Scrap site?

2 A Yes, they did.

3 Q Now, do you know the location or locations
4 where Chicago and Northwestern Railroad generated wastes
5 that were disposed of at the two sites?

6 A It's either the Northlake or Franklin Park
7 switching yards.

8 Q All right.

9 A Illinois.

10 Q In Illinois. All right.

11 And what types of waste did the Chicago
12 and Northwestern Railroad generate that were disposed of
13 at the two sites?

14 A Diesel fuel.

15 Q And how often did the Chicago and
16 Northwestern Railroad dispose of wastes at those sites?

17 A Five to eight tanker loads a month, and each
18 load would hold about four to five thousand gallons.

19 Q Okay. And that would be how many each month,
20 did you say?

21 A Five to eight tanker loads a month.

22 Q A month, all right. And over what
23 approximate period of time did this disposal occur at
24 these two sites?

1 A 1973 until some time in 1975.

2 Q Mr. Martell, do you know whether Chicago
3 Rawhide disposed of waste at the Ninth Avenue site?

4 A I don't remember at this time.

5 Q Do you know whether Chicago Rawhide disposed
6 of waste at the U.S. Scrap site?

7 A I don't remember at this time.

8 Q All right. Now, do you know whether
9 Chrome-Rite disposed of wastes at the Ninth Avenue site?

10 A Yes, they did.

11 Q Do you know whether Chrome-Rite also disposed
12 of waste at the U.S. Scrap site?

13 A No, they didn't.

14 Q All right. Do you know the location where
15 Chrome-Rite generated wastes that were disposed of at the
16 Ninth Avenue site?

17 A 4949 West Arthington Street in Chicago,
18 Illinois.

19 Q And what types of wastes did Chrome-Rite
20 generate that were disposed of at the Ninth Avenue site?

21 A Acid sludge.

22 Q And how often did Chrome-Rite dispose of
23 wastes at the Ninth Avenue site?

24 A Two thousand to three thousand gallons in a

1 tanker a month.

2 Q And over what approximate period of time did
3 Chrome-Rite generate wastes that were disposed of at the
4 Ninth Avenue site?

5 A 1974 until 1975.

6 Q Mr. Martell, do you know whether Chicago
7 Rotoprint disposed of waste at the Ninth Avenue site?

8 A Yes, they did.

9 Q Now, do you know if Chicago Rotoprint is a
10 division of some other company?

11 A I believe it's a division of W.F. Hall
12 Printing Company.

13 Q All right. Do you know whether Chicago
14 Rotoprint also disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you know the location where Chicago
17 Rotoprint generated wastes that were disposed of at the
18 two sites?

19 A 4601 West Belmont Avenue.

20 Q And what -- is that in Chicago?

21 A Oh, Chicago, Illinois.

22 Q All right. What types of wastes did Chicago
23 Rotoprint generate that were disposed of at the two sites?

24 A Inks, solvents and chemicals.

1 Q And how often did Chicago Rotoprint dispose
2 of wastes at the two sites?

3 A Fifty to eighty drums in a semi-trailer loads
4 three or four times a year.

5 Q And over what years did this disposal occur,
6 if you recall?

7 A Approximately 1972 until 1975.

8 Q Mr. Martell, do you know whether Chicago
9 Sheepskin disposed of waste at the Ninth Avenue site?

10 A Yes, they did.

11 Q Do you know whether Chicago Sheepskin also
12 disposed of waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Now, what is the location where Chicago
15 Sheepskin generated wastes that were disposed of at the
16 two sites?

17 A 4000 South Packers Avenue, Chicago, Illinois.

18 Q What types of waste did Chicago Sheepskin
19 generate that were disposed of at the two sites?

20 A Tank waste, I guess that's the best way, tank
21 waste.

22 Q And how often did Chicago Sheepskin generate
23 waste that was disposed of at the two sites?

24 A They disposed of 4500 gallons in a vacuum

1 tanker four to five times a month.

2 Q And over what approximate period of time did
3 Chicago Sheepskin dispose of waste at the two sites?

4 A 1972 until some time in 1975.

5 Q All right. Now, do you know whether Clark
6 Equipment disposed of waste at the Ninth Avenue site?

7 A Yes, they did.

8 Q All right. Now, do you know whether Clark
9 Equipment is a division of some other company?

10 A Yes, Clark Equipment, I believe, is a
11 division of Austin Western Company or the other way
12 around. I think it's Austin Western is a division of
13 Clark Equipment.

14 Q All right. Do you know whether Clark
15 Equipment also disposed of waste at the U.S. Scrap site?

16 A No, they didn't.

17 Q Now, do you know the location where Clark
18 Equipment generated wastes that were disposed of at the
19 Ninth Avenue site?

20 A 601 North Farnsworth Avenue, Aurora,
21 Illinois.

22 Q All right. What types of waste did Clark
23 Equipment generate that were disposed of at the Ninth
24 Avenue site, if you know?

1 A Oil.

2 Q And how often did Clark Equipment dispose of
3 waste at that site?

4 A They disposed of one to two 4500-gallon
5 vacuum tanker loads a month.

6 Q And over what approximate period of time did
7 Clark Equipment dispose of these wastes at the Ninth
8 Avenue site?

9 A 1974 till 1975.

10 Q All right. Mr. Martell, do you know whether
11 Clark Oil and Refining Company disposed of waste at the
12 Ninth Avenue site?

13 A Yes, they did.

14 Q Do you know whether Clark Oil and Refining
15 Company also disposed of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you know the location where Clark Oil and
18 Refining Company generated wastes that were disposed of at
19 the two sites?

20 A 129th Street and Kedzie Avenue in Blue
21 Island, Illinois.

22 Q And what types of waste did Clark Oil and
23 Refining Company generate that were disposed of at the two
24 sites?

1 A Oil, solvents and paint.

2 Q How often did Clark Oil and Refining Company
3 dispose of waste at the two sites?

4 A Clark Oil disposed of waste in three forms.
5 They dispose of their normal waste in tanker loads of five
6 to seven loads a week. They also disposed of oil and
7 gasoline sludge from tank cleaning, and that was about,
8 let's see, about 50 to 80 thousand gallons of oil or of
9 gasoline sludge.

10 Q How often?

11 A That was a one time tank cleaning or two time
12 tank cleaning that they had done that they were disposing
13 of.

14 Q All right.

15 A And then the last item is 50, they disposed
16 of 50 to 70 drums of paint, two or three times only.

17 Q All right. And over what approximate period
18 of time did these disposals occur?

19 A 1971 until some time in 1975.

20 Q All right. Mr. Martell, do you know whether
21 Coldwell General disposed of waste at the Ninth Avenue
22 site?

23 A I don't remember at this time.

24 Q Do you know whether Coldwell General disposed

1 of waste at the U.S. Scrap site?

2 A I don't remember at this time.

3 Q Mr. Martell, do you know whether Commander
4 Packaging disposed of waste at the Ninth Avenue site?

5 A Yes, they did.

6 Q Do you know whether Commander Packaging also
7 disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Now, do you know the location where Commander
10 Packaging generated wastes that were disposed of at the
11 two sites?

12 A 4925 Indiana Avenue, Lisle, Illinois.

13 Q And what types of waste did Commander
14 Packaging generate that were disposed of at the two sites?

15 A Solvents, adhesives and inks.

16 Q And how often did Commander Packaging dispose
17 of waste at the two sites?

18 A Fifty to eighty drums a amonth.

19 Q And over what approximate period of time did
20 this disposal occur?

21 A '73 to '75.

22 Q Do you know whether Container Corporation of
23 America disposed of wastes at the Ninth Avenue site?

24 A Let's see. No, they -- no, I don't think so,

1 I don't think they did.

2 Q Do you know whether Container Corporation of
3 America disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Now, do you know the location where Container
6 Corporation of America generated wastes that were disposed
7 of at the U.S. Scrap site?

8 A 400 East North Avenue, Carol Stream,
9 Illinois.

10 Q And what types of waste did Container
11 Corporation generate that were disposed of at the U.S.
12 Scrap site?

13 A Paints, solvents, inks, oils, and glues.

14 Q How often did Container Corporation dispose
15 of waste at that site?

16 A Twenty to forty drums every three or four
17 months.

18 Q And over what approximate period of time did
19 this disposal occur?

20 A 1965 until 1968.

21 Q Mr. Martell, do you know whether Collis
22 Company disposed of wastes at the Ninth Avenue site?

23 A Yes, they did.

24 Q Do you know whether Collis Company also

1 disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Now, do you know the -- do you know the
4 location where Collis Company generated wastes that were
5 disposed of at those two sites?

6 A Clinton, Iowa.

7 Q All right. And what types of waste did
8 Collis Company generate that were disposed of at the two
9 sites?

10 A Acid.

11 Q And how often did Collis dispose of wastes at
12 those sites?

13 A Two to three 4000-gallon loads a month.

14 Q And over what approximate period of time did
15 this disposal occur by Collis?

16 A 1972 until 1975.

17 Q Mr. Martell, do you know whether Continental
18 Can Company disposed of waste at the Ninth Avenue site?

19 A Yes, they did.

20 Q Do you know whether Continental Can Company
21 also disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Now, do you know the location or locations
24 where Continental Can Company generated wastes that were

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1 disposed of at the two sites?

2 A 5401 West 65th Street in Bedford Park, called
3 the clearing plant.

4 Q All right.

5 A 1819 North Major Avenue in Chicago, and it's
6 called the Whitecap plant. And then there's a plant in
7 Milwaukee, Wisconsin.

8 Q All right. Is the one that you mentioned,
9 the White Cap plant, is that also sometimes known as the
10 White Cap Company?

11 A Yes, White Cap + Bond Crown Div 1819 N. Major Ave

12 Q All right. Now, Mr. Martell, what -- let's
13 take these one by one.

14 What types of waste did the Bedford
15 Park plant generate that were disposed of at the two
16 sites?

17 A Solvents, paints, varnish, adhesives and
18 oils.

19 Q And how often did the Bedford Park
20 Continental Can plant dispose of these wastes at the two
21 sites?

22 A One trailer load of drums a month.

23 Q All right. And over what approximate period
24 of time did this disposal occur?

1 A 1965 until 1975.

2 Q Now, what types of waste did the White Cap
3 plant generate that were disposed of at the two sites?

4 A Same, solvents, paints, varnishes, adhesives
5 and oils.

6 Q And how often did this White Cap plant
7 dispose of wastes at the two sites?

8 A One to two trailer loads of drums a month,
9 and there would be 60 to 70 drums in each load.

10 Q And over what approximate period of time did
11 this disposal occur?

12 A 1965 to 1975.

13 Q And what types of wastes did the Milwaukee
14 plant generate that were disposed of at the two sites?

15 A Acid.

16 Q And how often did the Milwaukee plant dispose
17 of waste at the two sites?

18 A Two to three 4000-gallon tankers a month.

19 Q And over what approximate period of time did
20 this disposal occur?

21 A I don't remember --

22 Q All right.

23 A -- at this time.

24 Q Mr. Martell, did the Corn Products Company

1 dispose of waste at the Ninth Avenue site?

2 A Yes, they did.

3 Q Did the Corn Products Company also dispose of
4 wastes at the U.S. Scrap site?

5 A Yes, they did.

6 Q Is Corn Products Company also known as CPC?

7 A I believe it is.

8 Q All right. Now, do you know the location or
9 locations where Corn Products Company generated wastes
10 that were disposed of at the two sites?

11 A 63rd and Archer Road in Argo, Illinois.

12 Q And what types of wastes did Corn Products
13 Company generate that were disposed of at the two sites?

14 A Solvents, paints, oils and chemicals.

15 Q How often did Corn Products Company dispose
16 of waste at those sites?

17 A Twenty to forty drums three or four times a
18 year.

19 Q And over what approximate years did this
20 disposal that you've described occur?

21 A 1966 until 1975.

22 Q Mr. Martell, did Cosden Oil dispose of wastes
23 at the Ninth Avenue site?

24 A No, they didn't.

1 Q Did -- do you know whether Cosden Oil
2 disposed of waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q And what is the location where Cosden Oil
5 generated wastes that were disposed of at the U.S. Scrap
6 site?

7 A 142nd and Paxton Avenue, Calumet City,
8 Illinois.

9 Q Now, what types of waste did Cosden Oil
10 generate that were disposed of at the U.S. Scrap site?

11 A Plastic sludge from waste treatment pond.

12 Q All right. How often did Cosden Oil dispose
13 of waste at the U.S. Scrap site?

14 A They disposed of one load only of 4500
15 gallons in a vacuum tanker.

16 Q All right. And when did this occur?

17 A Approximately 1970.

18 Q All right. Mr. Martell, do you know whether
19 Crescent Company disposed of waste at the Ninth Avenue
20 site?

21 A I don't remember at this time.

22 Q Do you know whether Crescent disposed of
23 waste at the U.S. Scrap site?

24 A I don't remember at this time.

1 Q All right. Now, do you know whether Crown
2 Cork and Seal Company disposed of waste at the Ninth
3 Avenue site?

4 A Yes, they did.

5 Q Do you know whether Crown Cork and Seal
6 Company also disposed of waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you know the location where Crown Cork and
9 Seal generated wastes that were disposed of at the two
10 sites?

11 A 3501 West 31st Street, Chicago, Illinois.

12 Q What types of waste did Crown Cork and Seal
13 generate that were disposed of at the two sites?

14 A Solvents, paints, varnishes, adhesives, and
15 oils.

16 Q And how often did Crown Cork and Seal dispose
17 dispose of wastes at the two sites?

18 A Eighty to a hundred drums a month.

19 Q And over what approximate period of time did
20 this disposal occur?

21 A 1965 to 1975.

22 Q Mr. Martell, do you know whether the Culligan
23 Company disposed of wastes at the Ninth Avenue site?

24 A Yes, they did.

1 Q Do you know whether the Culligan Company also
2 disposed of waste at the U.S. Scrap site?

3 A I'm not sure.

4 Q All right. Do you know the location where
5 the Culligan Company generated the wastes that were
6 disposed of, at least at the Ninth Avenue site?

7 A One Culligan Parkway, Northbrook, Illinois.

8 Q And what type of waste did Culligan generate
9 that was disposed of at the Ninth Avenue site?

10 A Chemicals.

11 Q How often did Culligan dispose of waste at
12 Ninth Avenue?

13 A They first disposed of an accumulation of 50
14 to 70 drums and thereafter generated -- they generated and
15 disposed of 10 to 30 drums at a time.

16 Q And over what approximate period of time did
17 this disposal occur?

18 A 1974 until 1975.

19 Q All right. Mr. Martell, do you know whether
20 Cuneo Press disposed of waste at the Ninth Avenue site?

21 A No, they didn't.

22 Q Do you know whether Cuneo Press disposed of
23 waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Now, what is the location where Cuneo Press
2 generated wastes that were disposed of at the U.S. Scrap
3 site?

4 A 2242 South Grove Street, Chicago, Illinois.

5 Q And what types of waste did Cuneo Press
6 generate that were disposed of at Ninth Avenue?

7 A Acid and inks.

8 Q How often did Cuneo Press dispose of waste at
9 Ninth Avenue?

10 A They disposed of 50 to 60 drums in a load
11 approximately seven or eight times.

12 Q And over what approximate period of time did
13 this disposal by Cuneo Press occur?

14 A 1969 to 1971.

15 Q Mr. Martell, do you know whether Custom
16 Organics disposed of wastes at the U.S. Scrap site?

17 A I don't remember at this time.

18 Q All right. Do you know whether Custom
19 Organics disposed of waste at the U.S. Scrap site?

20 A I don't remember at this time.

21 Q Okay. Mr. Martell, do you know whether
22 Chicago Steel and Wire disposed of waste at the Ninth
23 Avenue site?

24 A Yes, they did.

1 Q Do you know whether Chicago Steel and Wire
2 Company also disposed of waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you know the location where Chicago Steel
5 and Wire generated wastes that were disposed of at the two
6 sites?

7 A 10257 South Torrence Avenue, Chicago,
8 Illinois.

9 Q Now, what types of waste did Chicago Steel
10 and Wire generate that were disposed of at the two sites?

11 A They disposed of four to five -- excuse me,
12 four- to five-thousand gallon vacuum tanker loads a month.

13 Q And -- all right. And what type of waste was
14 that?

15 A That was acid.

16 Q Acid?

17 And over what approximate period of
18 time did the disposal by Chicago Steel and Wire occur?

19 A 1970 until 1975.

20 MS. TIGHE: All right. Off the record.

21 (A discussion was held
22 off the record.)

23

24 (A recess was taken.)

1 MS. TIGHE: Q Mr. Martell, do you know whether
2 Danley Machine Company disposed of waste at the Ninth
3 Avenue site?

4 A No, they didn't.

5 Q Do you know whether Danley Machine Company
6 disposed of waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Now, do you know the location where Danley
9 Machine Company generated wastes that were disposed of at
10 the, later disposed of at the U.S. Scrap site?

11 A Only that it's in Cicero, Illinois.

12 Q All right. Now, what types of waste did
13 Danley Machine Company generate that were disposed of at
14 the U.S. Scrap site?

15 A Grease, paint and oils.

16 Q And how often did Danley Machine Company
17 dispose of waste at the U.S. Scrap site?

18 A Eight to ten drums a month.

19 Q And over what approximate period of time did
20 this disposal you've described occur?

21 A 1965 until 1969.

22 Q Mr. Martell, do you know whether Dap Ink
23 disposed of waste at the Ninth Avenue site?

24 A I don't remember at this time.

1 Q Do you know whether Dap Ink disposed of waste
2 at the U.S. Scrap site?

3 A I don't remember at this time.

4 Q Do you know whether Daubert Chemical disposed
5 of waste at the Ninth Avenue site?

6 A I don't remember at this time.

7 Q Do you know whether Daubert Chemical disposed
8 of waste at the U.S. Scrap site?

9 A I don't remember at this time.

10 Q Do you know whether Demert and Dougherty
11 disposed of waste at the Ninth Avenue site?

12 A I don't think they did.

13 Q I'm sorry. What was your answer,
14 Mr. Martell?

15 A I said I didn't think that they did.

16 Q You don't think they disposed of it at Ninth
17 Avenue?

18 A Right.

19 Q Do you know whether Demert and Dougherty
20 disposed of waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q What is the location where Demert and
23 Dougherty generated wastes that were disposed of at the
24 U.S. Scrap site?

1 A 5000 West 41st Street, Cicero, Illinois.

2 Q And what types of waste did Demert and
3 Dougherty generate that were later disposed of at the U.S.
4 Scrap site?

5 A Chemicals.

6 Q How often did Demert and Dougherty dispose of
7 waste at U.S. Scrap?

8 A Fifty to eighty drums a month.

9 Q And over what approximate period of time did
10 this disposal by Demert Dougherty occur?

11 A 1969 to 1972.

12 Q Mr. Martell, do you know whether DeSoto
13 Chemical disposed of waste at the Ninth Avenue site?

14 A Yes, they did.

15 Q Do you know whether DeSoto Chemical disposed
16 of waste also at the U.S. Scrap site?

17 A Yes, they did.

18 Q Now, what is the location where DeSoto
19 Chemical generated wastes that were disposed of at the two
20 sites?

21 A They disposed of waste from an old plant that
22 is no longer there, approximately 5th Avenue and Kilbourn
23 Avenue in Chicago. And the present plant that they
24 dispose of waste from is Chicago Heights, Illinois, and

1 that's 300 State Street in Chicago Heights, Illinois.

2 Q All right. Now, what types of waste did
3 DeSoto Chemical generate that were disposed of at the two
4 sites?

5 A Paints, solvents, varnishes, oils, resins,
6 and emulsions.

7 Q And how often did DeSoto Chemical dispose of
8 wastes at those sites?

9 A The Fifth Avenue plant disposed of two to
10 three trailer loads a month, and the Chicago Heights plant
11 disposed of three to four trailer loads a month.

12 Q And over what approximate period of time did
13 the Fifth Avenue plant dispose of wastes at the two sites?

14 A Starting in, some time in 1967 or '68, and I
15 don't know when that factory closed.

16 Q How about over what approximate period of
17 time did the Chicago Heights plant dispose of waste at the
18 two sites?

19 A 1968 until 1975.

20 Q All right. Mr. Martell, do you know whether
21 Dreeblan Paint disposed of waste at the Ninth Avenue site?

22 A Yes, they did.

23 Q Do you know whether Dreeblan Paint also
24 disposed of waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q Now, what is the location of Dreeblan Paint
3 that generated wastes that were disposed of at the two
4 sites?

5 A 3428 West 48th Place, Chicago, Illinois.

6 Q And what types of waste did Dreeblan Paint
7 generate that were disposed of at the two sites?

8 A Paints and solvents.

9 Q Now, how often did Dreeblan Paint dispose of
10 wastes at those sites, if you recall?

11 A Three to four, four- to five-gallon tankers a
12 month, and approximately --

13 Q Pardon me. Would you repeat that,
14 Mr. Martell? Three to four what sized tankers?

15 A Four- to five-thousand gallon tankers a
16 month.

17 Q Okay.

18 A And approximately 50 drums a month.

19 Q Okay. And over what approximate period of
20 time did this disposal occur?

21 A Approximately some time in 1972 until some
22 time in 1975.

23 Q All right. Mr. Martell, do you know whether
24 DuPont disposed of wastes at Ninth Avenue?

DuPont

1 A Yes, they did.

2 Q Do you know whether DuPont also disposed of
3 wastes at the U.S. Scrap site.

4 A Yes, they did.

5 Q And do you know the location or locations
6 where DuPont generated wastes that were disposed of at the
7 two sites?

8 A The plant was located at 2100 North Elston
9 Avenue, in Chicago.

10 Q And what types of wastes did DuPont generate
11 that were disposed of at the two sites?

12 A Paints, laquers, thinners, solvents, oils,
13 varnishes, dryers, rollers, varnishes, and contaminated
14 clothing.

15 Q All right. Now, how often did DuPont dispose
16 of wastes at those sites?

17 A One hundred to one hundred and fifty drums a
18 week.

19 Q And over what approximate period of time did
20 this disposal by DuPont occur?

21 A 1965 until 1975.

22 Q Mr. Martell, do you know whether Echo
23 Products Company disposed of waste at the Ninth Avenue
24 site?

CONFIDENTIAL

1 A Yes, they did.

2 Q Do you know whether Echo Products also
3 disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Now, what is the location where Echo Products
6 generated wastes that were disposed of at the two sites?

7 A I believe it's 1949 North Cicero Avenue,
8 Chicago, Illinois.

9 Q And what types of waste did Echo Products
10 generate that were disposed of at those two sites?

11 A Oils, solvents and paints.

12 Q And how often did Echo Products dispose of
13 waste at the two sites?

14 A They disposed of 80 to 120 drums a month.

15 Q And over what approximate period of time did
16 Echo Products dispose of wastes at the two sites?

17 A 1972 until 1975.

18 Q Mr. Martell, do you know whether Electronic
19 Plating disposed of wastes at the Ninth Avenue site?

20 A I don't remember at this time.

21 Q Do you know whether Electronic Plating
22 disposed of waste at the U.S. Scrap site?

23 A I don't remember at this time.

24 Q All right. Now, we have already discussed --

1 you've already described Elliott Paint, is that correct,
2 Mr. Martell?

3 A Yes.

4 Q All right. Do you know whether Englander
5 Mattress Company disposed of waste at the Ninth Avenue
6 site?

7 A No, they didn't.

8 Q Do you know whether Englander Mattress
9 Company disposed of waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q Now, what is the location where Englander
12 Mattress Company generated wastes that were disposed of at
13 the U.S. Scrap site?

14 A 104th Street and Champlaign Avenue, Chicago,
15 Illinois.

16 Q And what types of waste did Englander
17 generate that were disposed of at the U.S. Scrap site?

18 A Fabric and plastic and paint and dyes.

19 Q All right. How often did Englander dispose
20 of waste at U.S. Scrap?

21 A They disposed of approximately 100 drums
22 only.

23 Q All right. That was a one time thing? And
24 at -- when did this disposal occur?

1 MS. TIGHE: Off the record.

2 (A discussion was held
3 off the record.)
4

5 MS. TIGHE: Q Mr. Martell, going back to the
6 previous question, you answered that they disposed -- that
7 Englander disposed of approximately 100 drums of waste.

8 Was that over a period of time?

9 A Yes, it was.

10 Q And over what approximate period of time did
11 that occur?

12 A 1965 until 1968.

13 Q All right. Now, do you know whether
14 Enterprise Paint Company disposed of waste at the Ninth
15 Avenue site?

16 A Yes, they did.

17 Q Do you know whether Enterprise Paint also
18 disposed of waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q What was the location where Enterprise
21 generated wastes that were disposed of at at the two
22 sites?

23 A Approximately 28th and Ashland Avenue in
24 Chicago, Illinois.

1 Q And what types of waste did Enterprise
2 generate that were disposed of at the two sites?

3 A Paints, solvents, thinners, varnishes, wax,
4 chemicals, oils and coatings.

5 Q And how often did Enterprise Paint dispose of
6 waste at those sites?

7 A Four to five trailer loads of drums each
8 month and one 4000- to 5000-gallon load approximately
9 every three months.

10 Q All right. And over what approximate -- now,
11 do you know when the -- do you know when they began
12 disposing of tanker loads? Was it beginning at a certain
13 period of time?

14 A After 1971.

15 Q All right. And over what approximate years
16 were they disposing of the tanker loads, from 1971 until
17 about when?

18 A Until about 1975.

19 Q All right. And over what approximate years
20 did they dispose of the drums?

21 A 1965 until 1975.

22 Q All right. Mr. Martell, do you know whether
23 Enterprise Wire Company disposed of waste at the Ninth
24 Avenue site?

1 A Yes, they did.

2 Q Do you know whether Enterprise Wire also
3 disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q And do you know the location where Enterprise
6 Wire generated wastes that were disposed of at those two
7 sites?

8 A Vermont, Vermont Avenue in Blue Island,
9 Illinois.

10 Q And what types of waste did Enterprise Wire
11 generate that were disposed of at the two sites?

12 A Acid.

13 Q How often did Enterprise Wire dispose of
14 waste at those sites?

15 A Six to seven 5000-gallon loads a month.

16 Q And over what approximate period of time did
17 this disposal occur?

18 A 1970 until 1975.

19 Q All right. Mr. Martell, do you know whether
20 Felt Products Manufacturing Company disposed of waste at
21 the Ninth Avenue site?

22 A Yes, they did.

23 Q Do you know whether Felt Products
24 Manufacturing Company also disposed of waste at the U.S.

1 Scrap site?

2 A Yes, they did.

3 Q And what is the location where Felt Products
4 generated waste that were disposed of at the two sites?

5 A 7450 North McCormick Boulevard. That's
6 Skokie, Illinois.

7 Q All right. What types of waste did Felt
8 Products generate that were disposed of at this site?

9 A Oil.

10 Q All right. And how often did Felt Products
11 dispose of waste at those sites?

12 A They disposed of a trailer load of drums
13 three or four times a year.

14 Q And over what years did this disposal by Felt
15 Products occur?

16 A 1972 until 1975.

17 Q Mr. Martell, do you know whether Fiber Bond
18 disposed of wastes at the Ninth Avenue site?

19 A Yes, they did.

20 Q Do you know whether Fiber Bond also disposed
21 of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q What is the location where Fiber Bond
24 generated wastes that were disposed of at the two sites?

1 A 3300 South Kedzie Avenue, Chicago, Illinois.

2 Q And what types of waste did Fiber Bond
3 generate that were disposed of?

4 A Chemicals.

5 Q How often did Fiber Bond dispose of wastes at
6 the two sites?

7 A One to two four- to five-thousand gallon
8 tankers a month, and also drums, but I'm not sure of the
9 amount.

10 Q All right. And over what approximate period
11 of time did this disposal by Fiber Bond occur?

12 A 1965 until 1975.

13 MS. TIGHE: All right. Off the record.

14 (A discussion was held
15 off the record.)

16 MS. TIGHE: Q Mr. Martell, do you know whether
17 Flint Ink Company --

18 A Can I --

19 MS. TIGHE: Off the record.

20 (A discussion was held
21 off the record.)

22 MS. TIGHE: Q Mr. Martell, I started to ask you
23 about Flint Ink, but let me go back a minute to Fiber
24 Bond.

1 Do you know when Fiber Bond began
2 disposing of the tanker trucks of waste?

3 A Approximately some time around 1971 until
4 1975.

5 Q All right. That clarifies that.

6 Now, I started to ask you, Mr. Martell,
7 do you know whether Flint Ink Company disposed of waste at
8 the Ninth Avenue site?

9 A Yes, they did.

10 Q And do you know whether Flint Ink also
11 disposed of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q And what is the location where Flint Ink
14 generated wastes that were disposed of at the two sites?

15 A 2601 Gardener Road, Broadview, Illinois.

16 Q And what types of waste did Flint Ink
17 generate that were disposed of at the two sites?

18 A Inks, resins, solvents and oils.

19 Q And how often did Flint Ink dispose of waste
20 at those sites?

21 A One to two trailer loads of drums a month. A
22 trailer load in this case might be anywhere from 50 to 80
23 drums.

24 Q All right. And over what approximate period

1 of time did this disposal by Flint Ink occur?

2 A 1969 until 1975.

3 Q All right. Mr. Martell, do you know whether
4 Frederick H. Levey Ink Company disposed of waste at the
5 Ninth Avenue site?

6 A I don't remember at this time.

7 Q Do you know whether the Frederick H. Levey
8 Ink Company disposed of waste at the U.S. Scrap site?

9 A I don't remember at this time.

10 Q Mr. Martell, do you know whether Fox Valley
11 Manufacturing disposed of waste at the Ninth Avenue site?

12 A Yes, they did.

13 Q And do you know whether Fox Valley
14 Manufacturing also disposed of waste at the U.S. Scrap
15 site?

16 A Yes, they did.

17 Q Do you know the location where Fox Valley
18 Manufacturing generated waste that were disposed of at the
19 two sites?

20 A 1600 Fleetwood Drive, Elgin, Illinois.

21 Q And what types of waste did Fox Valley
22 Manufacturing generate that were disposed of at the two
23 sites?

24 A Paint.

1 Q How often did Fox Valley Manufacturing
2 dispose of waste at the two sites?

3 A They disposed of a trailer load of drums
4 approximately five to six times a year.

5 Q And over what years did the disposal by Fox
6 Valley occur?

7 A 1972 until 1975.

8 Q Mr. Martell, do you know whether Furnas
9 Electric disposed of waste at the Ninth Avenue site?

10 A Yes, they did.

11 Q Do you know whether Furnas Electric also
12 disposed of waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you know the location where Furnas
15 Electric generated wastes that were disposed of at the two
16 sites?

17 A 1000 McKee Street, Batavia, Illinois.

18 Q And what types of waste did Furnas Electric
19 generate that were disposed of at the two sites?

20 A Oils, solvents, paint and varnish.

21 Q And how often did Furnas Electric dispose of
22 waste at the two sites?

23 A Approximately they disposed of 20 to 40 drums
24 every 60 to 90 days.

1 Q And over what approximate period of time did
2 this disposal occur?

3 A 1970 until 1975.

4 Q Mr. Martell, do you know whether Georgia
5 Pacific Company disposed of waste at the Ninth Avenue
6 site?

7 A I'm not sure at this time.

8 Q Do you know whether Georgia Pacific Company
9 disposed of waste at the U.S. Scrap site?

10 A I am not sure at this time.

11 Q All right. Do you know whether Glidden Paint
12 Company disposed of waste at the Ninth Avenue site?

13 A Yes, they did.

Glidden

14 Q Do you know whether Glidden Paint also
15 disposed of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q And do you know the location where Glidden
18 Paints generated wastes that were disposed of at the two
19 sites?

20 A 1800 North LeClaire Street, Chicago,
21 Illinois.

22 Q And what types of waste did Glidden generate
23 that were disposed of at the two sites?

24 A Paint, varnish, resins and chemicals.

1 Q How often did Glidden dispose of waste at the
2 two sites?

3 A One to three trailer loads a month in drums.

4 Q All right. And over what approximate period
5 of time did this disposal by Glidden occur?

6 A 1967 until 1975.

7 Q Mr. Martell, do you know whether the Good
8 Humor Company disposed of waste at the Ninth Avenue site?

9 A Yes, yes, I do. Yes, they did. I'm sorry.
10 Yes, they did.

11 Q All right. Do you know whether Good Humor
12 Company also disposed of waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q And what is the location where the Good Humor
15 Company generated wastes that were disposed of at the two
16 sites?

17 A I don't know, but it's in Chicago.

18 Q And what type of waste, if you know, did Good
19 Humor generate that was disposed of at the two sites?

20 A Food waste.

21 Q All right. And how often did Good Humor
22 dispose of waste at those sites?

23 A They disposed of approximately one to two
24 four- to five-thousand gallon loads a week in ice cream

1 season.

2 Q Okay. And that would be the warmer weather,
3 I assume?

4 A Yes.

5 Q All right. And over what approximate period
6 of time did this disposal that you've described occur?

7 A I'm not sure.

8 Q All right. Mr. Martell, do you know whether
9 Graftec Press disposed of wastes at the Ninth Avenue site?

10 A I don't remember at this time.

11 Q Do you know whether Graftec disposed of waste
12 at the U.S. Scrap site?

13 A I don't remember at this time.

14 Q Mr. Martell, do you know whether Graphon,
15 Inc. disposed of waste at the Ninth Avenue site?

16 A Yes, they did.

17 Q Do you know whether Graphon also disposed of
18 waste at the U.S. Scrap site?

19 A No, they didn't.

20 Q All right. Now, what is the location where
21 Graphon generated wastes that were disposed of at Ninth
22 Avenue?

23 A 10045 Pacific Street, Franklin Park,
24 Illinois.

1 Q And what type of waste did Graphon generate
2 that was disposed of at the Ninth Avenue site?

3 A Acid.

4 Q How often did Graphon dispose of wastes at
5 Ninth Avenue?

6 A They disposed of two- to three-thousand
7 gallon loads three or four times a year.

8 Q And over what approximate period of time did
9 this disposal take place?

10 A Approximately '73 '73 to '75.

11 MS. TIGHE: All right. Off the record.

12 (A discussion was held
13 off the record.)

14 Q Okay. Mr. Martell, do you know whether W.F.
15 Hall Printing Company disposed of waste at the Ninth
16 Avenue site?

17 A Yes, they did.

18 Q Do you know whether W.F. Hall Printing also
19 disposed of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Now, do you know the location where W.F. Hall
22 generated wastes that were disposed of at the two sites?

23 A 4600 West Diversey Avenue, Chicago, Illinois.

24 Q And what types of waste did W.F. Hall

1 Printing generate that were disposed of?

2 A Inks and solvents.

3 Q And how often did W.F. Hall dispose of wastes
4 at the two sites?

5 A They disposed of approximately three to four
6 thousand gallons seven or eight times a year in tankers.

7 Q All right. And over what years did they
8 dispose of these wastes?

9 A 1969 until 1975.

10 Q All right. Mr. Martell, do you know whether
11 Hanna Waterways disposed of waste at the Ninth Avenue
12 site?

13 A Yes, they did.

14 Q Do you know whether Hanna Waterways also
15 disposed of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q And what is the location where Hanna
18 Waterways generated waste that were disposed of at the two
19 sites?

20 A Route 83 and Archer Road in Lemont, Illinois.

21 Q And what type of waste did Hanna Waterways
22 generate that was disposed of at the two sites?

23 A Oil.

24 Q How often did Hanna Waterways dispose of

1 waste at those sites?

2 A Four- to five-thousand gallon loads
3 approximately four to five times a year.

4 Q And over what years did Hanna dispose of
5 these wastes?

6 A 1973 until 1975.

7 Q Do you know whether Hendrickson Manufacturing
8 Company disposed of waste at the Ninth Avenue site?

9 A Yes, they did.

10 Q Do you know whether Hendrickson also disposed
11 of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you know the location where Hendrickson
14 generated waste that were disposed of at the two sites?

15 A Lyons, Illinois.

16 Q And Mr. Martell, what types of waste did
17 Hendrickson generate that were disposed of at the two
18 sites?

19 A Oil.

20 Q How often did Hendrickson dispose of waste at
21 these two sites?

22 A Two thousand gallons in a tanker three to
23 four times a year.

24 Q And over what approximate years, if you know,

1 did Hendrickson dispose of these wastes?

2 A 1971 until 1975.

3 Q Mr. Martell, do you know whether Heritage Ink
4 disposed of waste at the Ninth Avenue site?

5 A Yes, I do. Yes, they did.

6 Q All right. Do you know whether Heritage Ink
7 also disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q And what is the location where Heritage Ink
10 generated wastes that were disposed of at these two sites?

11 A 310 Gerri Lane, Addison, Illinois.

12 Q What types of waste did Heritage generate
13 that were disposed of at these two sites?

14 A Inks and solvents.

15 Q And how often did Heritage dispose of wastes
16 at these sites?

17 A Forty to sixty drums two or three times a
18 year.

19 Q And over what about period of time did
20 Heritage do this disposal at these sites?

21 A I'm not sure at this time.

22 Q All right. Mr. Martell, do you know whether
23 Hills-McCanna disposed of waste at the Ninth Avenue site?

24 A Yes, they did.

1 Q Do you know whether Hills-McCanna disposed of
2 wastes also at the U.S. Scrap site?

3 A Yes, they did.

4 Q Now, what is the location where Hills-McCanna
5 generated wastes that were disposed of at these two sites?

6 A I'm not sure at this time.

7 Q Do you know whether it was in Chicago?

8 A Let me see on this here. It should have
9 been, but it must be on the other paper. I think it's
10 Carpentersville.

11 Q All right. But you're not sure?

12 A No, see, it's on -- I'm not sure, though.
13 I'm not sure.

14 Q All right. Do you know what types of waste
15 Hills-McCanna generated that were disposed of at the two
16 sites?

17 A Oil.

18 Q And how often did Hills-McCanna generate
19 disposaldispose of waste at the two sites?

20 A One to two 5000-gallon loads a month.

21 Q And over what approximate period of time did
22 Hills-McCanna dispose of waste at the two sites?

23 A 1973 until 1975.

24 Q Mr. Martell, do you know whether Hodson

1 Corporation or E.F. Houghton Company disposed of wastes at
2 the Ninth Avenue site?

3 A I don't remember at this time.

4 MS. TIGHE: Off the record for a minute.

5 (A discussion was held
6 off the record.)

7 MS. TIGHE: Okay. Back on.

8 Q Do you know whether Hodson Corporation or
9 E.F. Houghton and Company disposed of waste at the U.S.
10 Scrap site?

11 A I'm not -- I don't remember at this time.

12 Q All right. Mr. Martell, do you know whether
13 Hoener-Waldorf disposed of waste at the Ninth Avenue site?

14 A Yes, they did.

15 Q Do you know whether Hoener-Waldorf also
16 disposed of waste at the U.S. Scrap site?

17 A No, they didn't.

18 Q Now, do you know the location where
19 Hoener-Waldorf generated wastes that were disposed of at
20 Ninth Avenue?

21 A Route 6 and Young Road, Joliet, Illinois.

22 Q And what type of waste did Hoener-Waldorf
23 generate that was disposed of at the two -- at the Ninth
24 Avenue site?

1 A Sludge.

2 Q And how often did Hoener-Waldorf dispose of
3 waste at Ninth Avenue?

4 A They disposed of two to four thousand gallons
5 of sludge in a tanker from one tank cleaning job.

6 MS. TIGHE: All right. Off the record.

7 (A discussion was held
8 off the record.)

9 MS. TIGHE: Q Over what time did this -- when did
10 this one time disposal occur, if you know?

11 A Some time in 1973 or 1974.

12 Q All right. And do you know what type of
13 sludge this was?

14 A No, I don't. I don't remember --

15 Q All right.

16 A -- at this time.

17 Q Mr. Martell, do you know whether Hotpoint
18 disposed of waste at the Ninth Avenue site?

19 A Yes, they did.

20 Q Now, do you know whether Hotpoint is a
21 division of General Electric?

22 A I believe it is.

23 Q All right. Do you know whether Hotpoint also
24 disposed of waste at U.S. Scrap site?

1 A Yes, they did.

2 Q Do you know the location or locations where
3 Hotpoint generated wastes that were disposed of at these
4 two sites?

5 A Only that it was the Cicero, Illinois plant.

6 Q And what types of waste did Hotpoint generate
7 that were disposed of at the two sites?

8 A Paints and solvents.

9 Q How often did Hotpoint dispose of waste at
10 these sites?

11 A They disposed of 30 to 40 drums two or three
12 times a year, and they also disposed of 2000 to 3000
13 gallons in tankers two or three times a year.

14 Q All right. And over what approximate years
15 did this disposal occur?

16 A 1970 until 1975.

17 Q Mr. Martell, do you know whether Howell
18 Company disposed of waste at the Ninth Avenue site?

19 A Yes, they did.

20 Q Do you know whether Howell also disposed of
21 waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q And do you know the location where Howell
24 generated these wastes that were then disposed of at the

1 two sites?

2 A 410 South First Street, St. Charles,
3 Illinois.

4 Q And what types of waste did Howell generate
5 that were disposed of at the two sites?

6 A Acid.

7 Q How often did Howell dispose of the acids at
8 two sites?

9 A A thousand to two thousand gallons in a
10 tanker one to two times a month.

11 Q And over what approximate period of time did
12 this disposal by Howell occur?

13 A 1972 until 1975.

14 Q Mr. Martell, do you know whether Hunt and
15 Wesson disposed of waste at the Ninth Avenue site?

16 A I don't remember at this time.

17 Q Do you know whether Hunt and Wesson also
18 disposed of waste at the U.S. Scrap site?

19 A I don't remember at this time.

20 MS. TIGHE: Off the record.

21 (A discussion was held
22 off the record.)

23 Q Okay. Mr. Martell, do you know whether
24 International Minerals and Chemicals disposed of waste at

1 the Ninth Avenue site?

2 A Yes, they did.

3 Q And is International Minerals and Chemicals
4 connected with McWarter Chemical?

5 A I believe they were.

6 Q All right. Do you think McWarter may have
7 been a division of International Minerals and Chemicals?

8 A One way or the other.

9 Q One way or the other. All right.

10 Did International Minerals and
11 Chemicals also dispose of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Now, do you know the location or locations
14 where International Minerals generated wastes that were
15 disposed of at these two sites?

16 A 400 East Cottage Avenue, Carpentersville,
17 Illinois.

18 Q All right. What types of waste did
19 International Minerals and Chemicals generate that were
20 then disposed of at the two sites?

21 A Varnishes, resins, oils and solvents.

22 Q All right. How often did International
23 Minerals and Chemicals dispose of waste at these sites?

24 A A trailer load of drums every, approximately

1 every 60 days.

2 Q All right. Over what approximate period of
3 time did this disposal by International Minerals occur?

4 A 1972 until 1975.

5 Q Mr. Martell, do you know whether ITT Harper
6 Corporation disposed of wastes at the Ninth Avenue site?

7 A I don't remember at this time.

8 Q Do you remember -- do you know whether ITT
9 Harper Corporation disposed of waste at the U.S. Scrap
10 site?

11 A I don't remember at this time.

12 Q Do you know whether Illinois Bronze Coatings
13 disposed of waste at the Ninth Avenue site?

14 A Yes, they did.

15 Q And do you know whether Illinois Bronze
16 Coatings also disposed of wastes at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you know the location where Illinois
19 Bronze Coatings generated wastes that were disposed of at
20 these two sites?

21 A 300 East Main Street, Lake Zurich, Illinois.

22 Q And what types of wastes did Illinois Bronze
23 Coatings generate that were disposed of at the two sites?

24 A Paint, solvents, varnish and powders.

1 Q And how -- how often did Illinois Bronze
2 Coatings dispose of waste at those sites?

3 A Fifty to sixty drums three to four times a
4 year.

5 Q And over what approximate years did this
6 disposal occur?

7 A 1972 until 1975.

8 Q Mr. Martell, do you know whether Industrial
9 Hard Chrome disposed of wastes at the Ninth Avenue site?

10 A Yes, they did.

11 Q Do you know whether Industrial Hard Chrome
12 also disposed of waste at the U.S. Scrap site?

13 A No, they didn't.

14 Q All right. Do you know the location where
15 Industrial Hard Chrome generated waste wastes that were
16 disposed of at the Ninth Avenue site?

17 A 901 Greenleaf Avenue, Elk Grove Village,
18 Illinois.

19 Q And what type of waste did Industrial Hard
20 Chrome generate that it then disposed of at Ninth Avenue?

21 A Acid.

22 Q How often did Industrial Hard Chrome dispose
23 of waste at Ninth Avenue?

24 A Three thousand to four thousand gallons in a

1 tanker every month.

2 Q And over what approximate period of time did
3 this disposal by Industrial Hard Chrome occur?

4 A 1973 to 1975.

5 Q Mr. Martell, do you know whether the
6 Institute of Gas Technology disposed of waste at the Ninth
7 Avenue site?

8 A Yes, they did.

9 Q And is -- do you know whether the Institute
10 of Gas Technology is part of People's Gas Company?

11 A Yes, it is.

12 Q Do you know whether the Institute of Gas
13 Technology also disposed of waste at the U.S. Scrap site?

14 A Yes, they did.

15 Q Now, do you know the location where the
16 Institute of Gas Technology generated wastes that were
17 disposed of at the two sites?

18 A Approximately 35th and Pulaski Avenue in
19 Chicago, Illinois.

20 Q And what types of waste did the Institute of
21 Gas Technology generate that were disposed of at the
22 sites?

23 A Chemicals, sludges and waste treatment
24 chemicals.

1 Q All right. Do you know what types of sludges
2 these were?

3 A No, I don't.

4 Q All right. Now, how often did the Institute
5 of Gas Technology dispose of waste at the two sites?

6 A Three-thousand to five-thousand gallon
7 tankers three to five times a week.

8 Q And over what approximate period of time did
9 this disposal by the Institute of Gas Technology occur?

10 A 1972 until 1975.

11 Q Mr. Martell, do you know whether Interlake
12 Steel Company disposed of waste at the Ninth Avenue site?

13 A Yes, they did.

14 Q And do you know whether Interlake also
15 disposed of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you know the location or locations where
18 Interlake Steel generated wastes that were disposed of at
19 the two sites?

20 A 134th Street in Riverdale, Illinois.

21 MS. TIGHE: Okay. Off the record.

22 (A discussion was held
23 off the record.)

24 Q Now, what type of waste did Interlake

1 generate that was disposed of at these two sites?

2 A Oil.

3 Q And how often did Interlake dispose of oil at
4 the two sites, if you know?

5 A Normally, 1000 to 2000 gallons of oil in a
6 tanker, one or two times a year, but a one time oil spill
7 into the Calumet River, they disposed of 3000 gallons of
8 oil in a tanker in approximately 1971 or 1972.

9 Q Okay. And with regard to their, to the --
10 except for the one time thing that you've mentioned, over
11 what approximate period of time did Interlake dispose of
12 waste at the two sites?

13 A 1971 do 1974.

14 Q All right. Mr. Martell, do you know whether
15 International Harvester Company disposed of waste at the
16 Ninth Avenue site?

17 A Yes, they did.

18 Q And do you know whether International
19 Harvester also disposed of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you know the location or locations where
22 International Harvester generated wastes that were
23 disposed of at the two sites?

24 A Yes, it was the West Pullman Works at 1015

1 West 120th Street, Chicago, Illinois.

2 Q And what types of waste did International
3 Harvester generate that were disposed of at the two sites?

4 A Acid.

5 Q How often did International Harvester dispose
6 of waste at those sites?

7 A Two to three times a week, they disposed of
8 four thousand gallons in a tanker.

9 Q All right. And over what approximate period
10 of time did this disposal by International Harvester
11 occur?

12 A 1973 to 1975.

13 Q Mr. Martell, do you know whether
14 International Multi Foods disposed of wastes at the Ninth
15 Avenue site?

16 A Yes, they did.

17 Q Do you know whether International Multi Foods
18 also disposed of waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q And do you know the location where
21 International Foods generated waste that were disposed of
22 at these two sites?

23 A 2000 North George Street, Melrose Park,
24 Illinois.

1 Q And what types of waste did International
2 Multi Foods generate that were disposed of at these sites?

3 A Coconut oil waste.

4 Q How often did International Multi Foods
5 dispose of waste at these sites?

6 A One to two three-thousand gallon loads each
7 month.

8 Q All right. And over what approximate period
9 of time did International Multi Foods dispose of these --
10 of the waste at these sites?

11 A 1972 to 1975.

12 Q Do you know whether Illinois Tool Works
13 disposed of waste at the Ninth Avenue site?

14 A Yes, they did.

15 Q Do you know whether Illinois Tool Works also
16 disposed of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you know the location where Illinois Tool
19 Works generated wastes that were disposed of at the two
20 sites?

21 A 8501 West Higgins Road, Chicago, Illinois.

22 Q And Mr. Martell, what types of waste did
23 Illinois Tool Works generate that were disposed of at
24 these two sites?

1 A Oil.

2 Q How often did Illinois Tool Works dispose of
3 the oil at these sites?

4 A Thirty to forty drums two to three times a
5 year, and three- to four-thousand gallon loads two or
6 three times a year.

7 Q All right. And over what approximate years
8 did this disposal occur?

9 A 1972 until 1975.

10 MS. TIGHE: All right. Off the record.

11 (A discussion was held
12 off the record.)

13

14 (The noon recess was taken.)

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CONFIDENTIAL

1 STATE OF ILLINOIS)
2 COUNTY OF C O O K) SS:
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4 IN RE THE MATTER OF:

5 U.S. SCRAP CORPORATION
6 and NINTH AVENUE DUMP
7

8 The continued Unsworn Statement of
9 STEVE MARTELL, taken at Suite 930, 33 North Dearborn
10 Street, Chicago, Illinois, on Tuesday, the 24th
11 day of May, A.D., 1988, at the hour of 1:00 P.M.
12

13 APPEARANCES:

14 MR. EDWARD KOWALSKI,
15 U.S. Environmental Protection Agency
16 Region Five

 Appeared on behalf of the U.S.
Environmental Protection Agency;

17
18 THE LAW OFFICES OF COTSIRILOS, CROWLEY,
STEPHENSON, TIGHE & STREICKER,

19 BY: MS. ANN C. TIGHE,

 Appeared on behalf of Steve Martell.
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CONTINUED EXAMINATION

BY

MS. TIGHE

1 Q Mr. Martell, do you know whether J.M. Huber
2 Ink Company disposed of waste at the Ninth Avenue
3 site?

4 A Yes, they did.

5 Q Do you know whether J.M. Huber Ink also
6 disposed of waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you know the location where J.M. Huber
9 generated wastes that were disposed of at the two
10 sites?

11 A First Avenue and Route 66, McCook, Illinois.

12 Q What types of waste did J.M. Huber generate
13 that were disposed of at the two sites?

14 A Inks, resins and solvents.

15 Q How often did J. M. Huber dispose of
16 these wastes at the two sites, if you know?

17 A One to two semi trailer loads of drum
18 waste a month.

19 Q Over what approximate period of time did
20 Huber dispose of these wastes at the two sites?

21 A 1965 until 1975.

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1 Q Mr. Martell, do you know whether Janette
2 and Company disposed of waste at the Ninth Avenue
3 site?

4 A I don't remember at this time.

5 Q Do you know whether Janette and Company
6 disposed of waste at the U.S. Scrap site?

7 A I don't remember at this time.

8 Q Mr. Martell, do you know whether Jett
9 Dye Castings disposed of waste at the Ninth Avenue
10 site?

11 A I don't remember at this time.

12 Q Do you know whether Jett Dye Castings
13 disposed of waste at the U.S. Scrap site?

14 A I don't remember at this time.

15 Q Do you know whether Jewel Paint Company
16 disposed of waste at the Ninth Avenue site?

17 A I don't remember at this time.

18 Q Would you know whether Jewel Paint Company
19 disposed of waste at the U.S. Scrap site?

20 A I don't remember at this time.

21 Q Mr. Martell, do you know whether Jones
22 and Cleary Roofing Company disposed of waste at
23 the Ninth Avenue site?

24 A No.

1 Q Do you know whether the Jones and Cleary
2 Roofing Company disposed of waste at the U.S. Scrap
3 site?

4 A Yes, yes they did.

5 Q They did?

6 A Yes.

7 Q Do you know the location where Jones
8 and Cleary Roofing Company generated wastes that
9 were disposed of at the U.S. Scrap site?

10 A Various roofs in Chicago.

11 Q What types of waste did Jones and Cleary
12 Roofing generate that were disposed of at the U.S.
13 Scrap site?

14 A Roofing, pebbles and dirt.

15 Q How often did Jones and Cleary dispose
16 of waste at the U.S. Scrap site?

17 A I don't remember.

18 Q Do you recall over what period of time
19 Jones and Cleary disposed of waste at the U.S.
20 Scrap site?

21 A Approximately 1972 to 1973.

22 Q Mr. Martell, do you know whether the
23 Kitchens of Sara Lee disposed of waste at the
24 Ninth Avenue Site?

1 A Yes, they did.

2 Q Do you know whether the Kitchens of Sara
3 Lee is a division or in some way associated with
4 Consolidated Food Corporation?

5 A I believe it is.

6 Q Do you know whether Kitchens of Sara
7 Lee also disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know the location where Kitchens
10 of Sara Lee generated wastes that were disposed
11 of at these two sites?

12 A 500 Waukegan Road, Deerfield, Illinois.

13 Q What types of waste did Kitchens of Sara
14 Lee generate that were disposed of at the two
15 sites?

16 A Food waste.

17 Q How often did the Kitchens of Sara Lee
18 dispose of waste at the two sites?

19 A One-5,000 gallon tanker a day.

20 Q Over what approximate period of time
21 did the Kitchens of Sara Lee dispose of these
22 wastes at the two sites?

23 A 1972 until 1975.

24 Q Mr. Martell, do you know whether Lake River

1 Terminals disposed of waste at the Ninth Avenue
2 site?

3 A I don't remember at this time.

4 Q Do you know whether Lake River Terminals
5 disposed of waste at the U.S. Scrap site?

6 A I don't remember at this time.

7 Q Do you know whether LaSalle Management
8 Company disposed of waste at the Ninth Avenue
9 site?

10 A Yes, yes they did.

11 Q Do you know whether LaSalle Management
12 Company also disposed of waste at the U.S. Scrap
13 site?

14 A Yes, they did.

15 Q What location, from what location did
16 LaSalle Management Company generate wastes that
17 were disposed of at these two sites?

18 A I think it's the LaSalle National Bank
19 building.

20 Q What types of waste did LaSalle Management
21 Company generate that were disposed of at the two
22 sites?

23 A I don't know.

24 Q How often did LaSalle Management Company

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dispose of waste at these sites?

A I am not sure.

Q Do you know over what period of time LaSalle Management Company disposed of waste?

A No, I'm not sure.

Q Mr. Martell, do you know whether Leavitt Tube Company disposed of waste at the Ninth Avenue site?

A Yes, they did.

Q Do you know whether Leavitt Tube also disposed of waste at the U.S. Scrap site?

A Yes, they did.

Q Do you know the location where Leavitt Tube generated wastes that were disposed of at the two sites?

A 1717 West 115th Street, Chicago, Illinois.

Q What type of waste did Leavitt Tube generate that was disposed of at these two sites?

A Acid.

Q If you know , how often did Leavitt Tube dispose of waste at the two sites?

A One, four to five thousand gallon tanker load every other month.

Q Over what period of time did this disposal

1 occur?

2 A 1973 to 1975.

3 Q Do you know whether Libby, MacNeal disposed
4 of waste at the Ninth Avenue site?

5 A Yes, they did.

6 Q Do you know whether Libby, MacNeal also
7 disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Is this company, Libby, MacNeal, Libby?

10 A Yes, it is.

11 Q From what location did Libby, MacNeal
12 generate waste that were disposed of at the two
13 sites?

14 A 119th Street and Ashland Avenue in Chicago,
15 Illinois.

16 Q What types of waste did Libby, MacNeal
17 generate that were disposed of at the two sites?

18 A Grease and oily food waste.

19 Q How often did Libby, MacNeal dispose of
20 waste at the sites, if you know?

21 A Two to three tankers a month, approximately
22 four to five thousand gallons in each load.

23 Q Over what approximate period of time
24 did this disposal occur?

1 A 1971 to 1975.

2 Q Mr. Martell, do you know whether Lindblum
3 High School in Chicago disposed of waste at the
4 Ninth Avenue site?

5 A I don't remember at this time.

6 Q Do you know whether Lindblum High School
7 disposed of waste at the U.S. Scrap site?

8 A I don't remember at this time.

9 Q Mr. Martell, do you know whether Lawter
10 Chemical disposed of waste at the Ninth Avenue
11 site?

12 A I don't remember at this time.

13 Q Do you know whether Lawter Chemical disposed
14 of waste at the U.S. Scrap site?

15 A I don't remember at this time.

16 Q Mr. Martell, do you know whether MacLean-
17 Fogg Company disposed of waste at the Ninth Avenue
18 site?

19 A Yes, they did.

20 Q Do you know whether MacLean-Fogg also
21 disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you know the location where MacLean- Fogg
24 generated wastes that were disposed of at the two sites?

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1 A It's 1000 Allenson Road, Mundelein,
2 Illinois.

3 Q What type of waste did MacLean-Fogg
4 generate that was disposed of at the two sites?

5 A Oil.

6 Q How often did MacLean-Fogg dispose of
7 waste at those sites?

8 A One to two 5,000 gallon tanker loads
9 a month.

10 Q Over what approximate period of time
11 did this disposal by MacLean-Fogg occur?

12 A 1973 to 1975.

13 Q Mr. Martell, do you know whether Magee
14 Chemical disposed of waste at the Ninth Avenue
15 site?

16 A Yes, they did.

17 Q Do you know whether Magee also disposed
18 of waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q From what location did Magee Chemical
21 generate wastes that were disposed of at the
22 two sites?

23 A 415 West Touhy Avenue, DesPlaines, Illinois.

24 Q What type of waste did Magee generate

1 that was disposed of at these two sites?

2 A Acid.

3 Q How often if you know, did Magee dispose
4 of waste at the two sites?

5 A One to two, 4,000 gallon loads a month.

6 Q Would that be a tanker load?

7 A Yes, a tanker load.

8 Q Over what approximate period of time
9 did Magee dispose of these wastes at the two sites?

10 A 1972 to 1975.

11 Q Mr. Martell, do you know whether Marathon
12 Oil Company disposed of waste at the Ninth Avenue
13 site?

14 A I don't remember at this time.

15 Q Do you know whether Marathon disposed
16 of waste at the U.S. Scrap site?

17 A I don't remember at this time.

18 Q Do you know whether Martin Senour Paint
19 Company disposed of waste at the Ninth Avenue site?

20 A Yes, they did.

21 Q Do you know whether Martin Senour disposed
22 of waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q From what location did Martin Senour generate

1 wastes that were disposed of at these sites?

2 A 2500 Senour Avenue, Chicago, Illinois.

3 Q Is that S-e-n-o-u-r Avenue?

4 A Yes, however you say that word I don't
5 know.

6 Q What types of waste did Martin Senour
7 generate that were disposed of at the two sites?

8 A Solvents and paints.

9 Q How often did Martin Senour dispose of
10 waste at those sites?

11 A One to two 4,000 to 5,000 gallon tanker
12 loads a month.

13 Q Over what approximate period of time did
14 this disposal occur?

15 A 1972 to 1975.

16 Q Do you know whether Martin Senour is
17 associated with or a division of Sherwin-Williams
18 Paint Company?

19 A I believe it is.

20 Q Do you know whether Matherson, Selig
21 disposed of waste at the Ninth Avenue site?

22 A I don't remember at this time.

23 Q Do you know whether Matherson, Selig
24 disposed of waste at the U.S. Scrap site?

1 A I don't remember at this time.

2 Q Do you know whether MaGraw, Edison

3 disposed of waste at the Ninth Avenue site?

4 A I don't remember at this time.

5 Q Do you know whether MaGraw, Edison

6 disposed of waste at the U.S. Scrap site?

7 A I don't remember at this time.

8 Q Mr. Martell, do you remember whether

9 Midwest Brass disposed of waste at the Ninth

10 Avenue site?

11 A Yes, they did.

12 Q Do you know whether Midwest Brass also

13 disposed of waste at the U.S. Scrap site?

14 A Yes, they did.

15 Q From what location did Midwest Brass

16 generate wastes that were disposed of at the two

17 sites?

18 A 10017 Franklin Avenue, Franklin Park,

19 Illinois.

20 Q What type of waste did Midwest Brass

21 generate that was disposed of at the two sites?

22 A Acid.

23 Q How often did Midwest Brass dispose of

24 waste at these two sites?

1 A 2,000 to 3,000 gallons in a tanker about
2 **every couple of months.**

3 Q Over what approximate period of time
4 did this disposal occur?

5 A 1973 until 1975.

6 Q Do you know whether Midwest Wrecking
7 Company disposed of waste at the Ninth Avenue
8 site?

9 A Yes, they did.

10 Q Do you know whether Midwest Wrecking
11 also disposed of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you know the location from which
14 Midwest generated waste that were disposed of
15 at the two sites?

16 A Buildings being torn down all over
17 Chicago and suburbs.

18 Q What types of waste did Midwest
19 **generate** that were disposed of at the two sites?

20 A Building debris consisting of wood and
21 concrete.

22 Q How often did Midwest dispose of waste
23 at the two sites, if you know?

24 A I'm going to say 1972 to 1975.

1 Q During that period of time?

2 A Yes.

3 Q Do you know whether Mobil Chemical disposed
4 of waste at the Ninth Avenue site?

5 A No, I don't think so.

6 Q Do you know whether Mobil Chemical disposed
7 of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know the location where Mobil
10 Chemical generated wastes that were disposed of at
11 the U.S. Scrap site?

12 A 901 North Greenwood Street, Kankakee,
13 Illinois.

14 Q What type of waste? What types of waste
15 did Mobil Chemical generate that were disposed of
16 at U.S. Scrap?

17 A Paint, solvents, oils and thinners.

18 Q How often did Mobile Chemical dispose of
19 waste at U.S. Scrap?

20 A I don't know the amount.

21 Q Do you know the approximate period of
22 time that Midwest -- I mean that Mobil Chemical
23 disposed of waste at these sites?

24 A 1970 to 1972.

1 Q Mr. Martell, do you know whether Monsanto
2 disposed of waste at the Ninth Avenue Site?

3 A Yes, they did.

4 Q Do you know whether Monsanto also disposed
5 of waste at the U.S. Scrap site?

6 A Yes, they did.

7 Q Do you know the location from which
8 Monsanto generated the wastes that were disposed
9 of at the two sites?

10 A Muskatene, Iowa.

11 Q What types of waste did Monsanto generate
12 that were disposed of at these sites?

13 A I believe it was amonia and solvents.

14 Q Do you know how often Monsanto disposed
15 of wastes at these sites?

16 A I'm not sure of the volume.

17 Q Do you know over what approximate period
18 of time Monsanto disposed of wastes?

19 A Approximately 1971 to 1974.

20 Q Do you know whether Morton Chemicals
21 disposed of wastes at the Ninth Avenue site?

22 A Yes, they did.

23 Q Do you know whether Morton Chemicals also
24 disposed of waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q Do you know the location where Morton
3 Chemicals generated wastes that were disposed of at
4 the two sites?

5 A There is two plants. One is in Ringwood,
6 Illinois, and one is in Elk Grove Village, Illinois.

7 Q How often did the Ringwood location
8 dispose of the wastes at these sites?

9 A One to two trailer loads a month.

10 Q What types of wastes were these that
11 Morton Chemical generated at the Ringwood site?

12 A These were chemicals.

13 Q I mean what type of wastes?

14 A Chemicals.

15 Q Over what period of time did Morton
16 Chemicals dispose of wastes at the two sites?

17 A From Ringwood?

18 Q From Ringwood, yes. Thank you.

19 A 1970 to 1975.

20 Q As far as the Elk Grove Village Plant is
21 concerned, what type of waste did that location
22 generate that were disposed of at the two sites?

23 A It was different. It was solvents, coatings
24 and adhesives.

1 Q How often did the Elk Grove Village location
2 dispose of waste at the two sites?

3 A One to two trailer loads a month.

4 Q Over what approximate period of time did
5 this disposal from the Elk Grove Village location
6 occur?

7 A 1972 to 1975.

8 Q Mr. Martell, do you know whether Motive
9 Industries disposed of waste at the Ninth Avenue
10 site?

11 A Yes, they did.

12 Q Do you know whether Motive Industries
13 also disposed of waste at the U.S. Scrap site?

14 A Yes, they did.

15 Q From what location did Motive Industries
16 generate wastes that were then disposed of at the
17 two sites?

18 A 5253 West Roosevelt Road, Chicago, Illinois.

19 Q What type of waste did Motive Industries
20 generate that were later disposed of at the two sites?

21 A Acid.

22 Q How often did Motive Industries dispose
23 of waste at the two sites, if you know?

24 A One, 4,000 gallon tanker load a month.

1 Q Over what approximate period of time did
2 this disposal occur?

3 A 1973 to 1975.

4 Q Mr. Martell, do you know where Motorwheel
5 Corporation disposed of any wastes at the Ninth
6 Avenue site?

7 A No, they didn't.

8 Q Do you know whether Motorwheel Corporation
9 disposed of any waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q Do you know the location where Motorwheel
12 generated wastes that were disposed of at U.S. Scrap?

13 A 605 - 12th Street, Mendota, Illinois.

14 Q What type of waste did Motorwheel Corporation
15 generate that was disposed of at U.S. Scrap?

16 A Oily sludge.

17 Q How often did Motorwheel dispose of waste
18 at U.S. Scrap?

19 A Approximately 60 drums of sludge from a
20 one-time tank cleaning project.

21 Q Approximately when did this tank cleaning
22 project occur that resulted in disposal at the U.S.
23 Scrap site?

24 A Sometime either in 1971 or 1972.

1 Q Mr. Martell, do you know whether Nalco
2 Chemical disposed of waste at the Ninth Avenue
3 site?

4 A Yes, they did.

5 Q Do you know that Nalco Chemical also
6 disposed of waste at the U.S. Scrap site?

7 A Yes, they did.

8 A Do you know the location where Nalco
9 Chemical generated wastes that were disposed of at
10 the two sites?

11 A 621t West 66th Street, Bedford Park,
12 Illinois.

13 Q What type of waste did Nalco generate
14 that was disposed of at the two sites?

15 A Various chemicals.

16 Q How often did Nalco dispose of waste at
17 those sites if you know?

18 A One to two, 4,500 gallon tankers a month.

19 Q Over what approximate period of time did
20 this disposal occur?

21 A 1972 to 1974.

22 Q Mr. Martell, do you know whether Namsco
23 disposed of waste at the Ninth Avenue site?

24 A Yes, they did.

1 Q Do you know whether Namsco also disposed
2 of waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you know the location where Namsco
5 generated waste disposed of at the two sites?

6 A 333 - 31st Street, Bellwood, Illinois.

7 Q What types of waste did Namsco generate
8 that were disposed of at the two sites, if you
9 know?

10 A Oil.

11 Q How often did Namsco dispose of waste at
12 these two sites?

13 A 10 to 20 drums, one or two times a year.

14 Q Over what years did this disposal by
15 Namsco occur?

16 A Some time from 1973 to 1975.

17 Q Mr. Martell, do you know whether Nashua
18 disposed of waste at the Ninth Avenue site?

19 A I don't think so.

20 Q Do you know whether Nashua was disposing
21 of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you know Mr. Martell, whether Nashua
24 was associated with or a division of Johnsmantown?

1 A I believe it's a division of Johnsmantown.

2 Q Do you know the location where Nashua
3 was generating wastes that were disposed of at the
4 U.S. Scrap site?

5 A 7800 South Woodlawn Avenue, Chicago,
6 Illinois.

7 Q What types of waste did Nashua generate
8 that were disposed of at U.S. Scrap?

9 A Solvents and rubber.

10 Q How often did Nashua dispose of these
11 wastes at U.S. Scrap?

12 A 50 to 70 drums a week.

13 Q Over what approximate period of time did
14 this disposal by Nashua occur?

15 A 1965 until 1969.

16 Q Mr. Martell, do you know whether National
17 Can Company disposed of waste at the Ninth Avenue
18 site?

19 A Yes, they did.

20 Q Do you know whether National Can Company
21 also disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you know the location or locations where
24 National Can Company generated wastes that were disposed

1 of at the two sites?

2 A There were three locations. One is
3 5620 West 51st Street, Summit, Illinois. Another
4 one is at or was at I should say, 3217 West 47th
5 Street, Chicago, Illinois, and the third one is in
6 LaPort, Indiana.

7 Q Taking the Summit location first, do you
8 know what type of waste National Can generated from
9 the Summit location that were disposed of at the
10 two sites?

11 A Solvents, paints, varnishes and adhesives.

12 Q How often did National Can Summit Location
13 dispose of these wastes at the two sites?

14 A 30 to 50 drums a month.

15 Q Over what approximate period of time did
16 the Summit location dispose of these wastes at the
17 two sites?

18 A 1972 until 1975.

19 Q With regard to the 47th Street location
20 what types of waste did National Can Company
21 generate from that location that were disposed of
22 at the two sites?

23 A Solvents, paints, varnishes and adhesives.

24 Q How often did that 47th Street location

1 dispose of waste at the two sites?

2 A 15 to 20 drums a month.

3 Q Over what approximate period of time did
4 that disposal occur?

5 A 1972 to 1975.

6 Q Then with regard to the LaPort location
7 what types of waste did National Can Company
8 generate from the LaPort location that were disposed
9 of at the two sites?

10 A Did you say what kind of waste?

11 Q Yes. What type of waste?

12 A This was chemical -- oh, solvents.

13 Q How often did that LaPort location
14 dispose of wastes at the two sites?

15 A One to two, 4,000 to 5,000 gallon tanker
16 loads a week.

17 Q Over what approximate period of time did
18 that disposal from the LaPort location occur?

19 A 1972 to 1975.

20 Q Mr. Martell, do you know whether National
21 Precision Circuits disposed of waste at the Ninth
22 Avenue site?

23 A Yes, they -- wait a minute. Yes, they did.

24 Q Do you know whether National Precision Circuits

1 also disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you know the location where National
4 Precision Circuits generated wastes that were disposed
5 of at the two sites?

6 A 2925 Lucy Lane, Franklin Park, Illinois.

7 Q What type of waste did National Precision
8 Circuits generate that was later disposed of at
9 those two sites?

10 A Acid.

11 Q How often did National Precision dispose
12 of waste at those sites?

13 A Approximately one, 4,500 gallon tanker
14 load a month.

15 Q Over what approximate period of time
16 did National Precision dispose of the waste at
17 these sites?

18 A 1973 until 1975.

19 Q Mr. Martell, do you know whether National
20 Steel Container disposed of waste at the Ninth
21 Avenue Site?

22 A I don't remember at this time.

23 Q Do you recall whether National Steel Container
24 disposed of waste at the U.S. Scrap site?

1 A I don't remember at this time.

2 Q Mr. Martell, do you know whether National
3 Wrecking Company disposed of waste at the Ninth
4 Avenue site?

5 A No, they didn't.

6 Q Do you know whether National Wrecking
7 Company disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know the locations from which
10 National Wrecking Company generated wastes that were
11 disposed of at the U.S. Scrap site?

12 A Various wrecking jobs throughout the city.

13 Q What types of waste did National Wrecking
14 generate that were disposed of at this site?

15 A Concrete and wood from building demolition.

16 Q Over what approximate period of time did
17 National Wrecking dispose of waste at the sites?

18 A Approximately 1973, '74.

19 Q Mr. Martell, do you know whether the
20 U.S. Government Nike Silo sites generated wastes
21 that were disposed of at the Ninth Avenue site?

22 A No, they didn't.

23 Q Do you know whether the U.S. Government
24 Nike Silo sites disposed of waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q Do you know the location or locations where
3 these Nike Silo sites generated wastes that were
4 disposed of at U.S. Scrap?

5 A I vaguely remember two. One is in Jackson
6 Park on the south side of Chicago, and the other
7 one is approximately 31st Street and Lake Shore Drive.

8 Q What type of waste did these Nike Silos
9 generate that were disposed of at those two sites,
10 if you know?

11 A Some type of oil.

12 Q How often did the Nike Silos dispose of
13 waste at these sites?

14 A One time and it was approximately two to
15 3,000 gallons total from all the sites.

16 Q Approximately when did this disposal occur,
17 if you know?

18 A Approximately some time in 1970 or 1971.

19 Q Mr. Martell, do you know whether Outboard
20 Marine disposed of waste at the Ninth Avenue site?

21 A No, they didn't.

22 Q Do you know whether Outboard Marine disposed
23 of waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you know whether Outboard Marine is
2 connected in some way with Johnson Motors?

3 A I think it is.

4 Q Do you know the location from which
5 Outboard Marine generated wastes that were disposed
6 of at U.S. Scrap?

7 A I think it's Waukegan, Illinois.

8 Q What type of waste did Outboard Marine
9 generate that was disposed of at U.S. Scrap?

10 A Dirty gasoline drained from outboard motors.

11 Q How often did Outboard Marine dispose of
12 waste at U.S. Scrap?

13 A I am not sure.

14 Q Do you know during what approximate period
15 of time Outboard Marine disposed of waste at U.S.
16 Scrap?

17 A I am not sure, but I think it's 1969 to
18 '70.

19 Q Mr. Martell, do you know whether PPG Industries
20 disposed of waste at the Ninth Avenue site?

21 A Yes, they did.

22 Q Do you know whether PPG also disposed of
23 waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you know the location or locations
2 where PPG generated wastes that were disposed of at
3 the two sites?

4 A The first location would have been Milwaukee,
5 Wisconsin before they moved to their new plant at
6 Oak Creek, Wisconsin.

7 Q What types of waste did PPG generate that
8 were disposed of at the two sites?

9 A Paints, solvents, coatings.

10 Q How often did PPG dispose of waste at
11 the two sites, if you know?

12 A Three to four trailer loads a month.

13 Q Over what approximate period of time
14 did PPG dispose of waste at these sites?

15 A 1969 to 1975.

16 Q Do you know whether Penn-Dixie Steel
17 disposed of waste at the Ninth Avenue site?

18 A I don't remember at this time.

19 Q Do you know whether Penn-Dixie Steel disposed
20 of waste at the U.S. Scrap site?

21 A I don't remember at this time.

22 Q Do you know the -- do you know whether
23 Pierce, Stevens Chemical Company disposed of
24 waste at the Ninth Avenue site?

1 A Yes, they did.

2 Q Do you know whether Pierce, Stevens also
3 disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you know the location where Pierce,
6 Stevens generated wastes that were disposed of at
7 the two sites?

8 A 245 East Kehoe Street, Carol Stream,
9 Illinois.

Pierce

10 Q What types of waste did Pierce, Stevens
11 generate that were disposed of at the two sites?

12 A Solvents, paints, lackers and coatings.

13 Q How often did Pierce, Stevens dispose
14 of wastes at these sites, if you know?

15 A 50 to 70 drums a month.

16 Q Over what approximate period of time did
17 this disposal by Pierce, Stevens occur?

18 A 1972 to approximately 1975.

19 Q Mr. Martell, do you know whether Pittsburg
20 Metals disposed of waste at the Ninth Avenue site?

21 A No, I don't remember at this time.

22 Q Do you know whether Pittsburg Metals
23 disposed of waste at the U.S. Scrap site?

24 A I don't remember at this time.

1 Q Mr. Martell, do you know whether Precision
2 Twist Drill Company disposed of waste at the Ninth
3 Avenue site?

4 A Yes, they did.

5 Q Do you know whether Precision Twist Drill
6 also disposed of waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you know the location where Precision
9 Twist Drill generated wastes that were disposed of
10 at the two sites?

11 A 301 Industrial Avenue, Crystal Lake, Illinois.

12 Q Do you know what types of waste Precision
13 Twist generated that were then disposed of at the
14 two sites?

15 A Oils, solvents, acid.

16 Q How often did Precision Twist Drill dispose
17 of waste at the two sites?

18 A One, two to 3,000 gallon tanker load a
19 month.

20 Q Over what approximate period of time did
21 the disposal by Precision Twist Drill occur?

22 A 1973 to 1975.

23 Q Mr. Martell, do you know whether Prefinished
24 Metals disposed of waste at the Ninth Avenue site?

1 A Yes, they did.

2 Q Do you know whether Prefinished Metals
3 also disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you know the location where Prefinished
6 Metals generated wastes that were disposed of at
7 the two sites?

8 A 2300 East Pratt Boulevard, Elk Grove
9 Village, Illinois.

10 Q What type of waste did Prefinished Metals
11 generate that were disposed of at these sites?

12 A Paints and solvents.

13 Q How often did Prefinished Metals dispose
14 of waste at the two sites?

15 A 50 to 70 drums every two to three months.

16 Q Over what approximate period of time did
17 this disposal by Prefinished Metals occur?

18 A 1973 to 1975.

19 Q Mr. Martell, do you know whether Premier
20 Paints disposed of waste at the Ninth Avenue site?

21 A Yes, they did.

22 Q Mr. Martell, is Premier Paints the same
23 thing as Premier Coatings?

24 A I believe it is.

1 Q Do you know whether Premier Paints also
2 disposed of waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you know the location where Premier
5 Paints generated wastes that were disposed of at
6 the two sites?

7 A 2250 Arthur Avenue, Elk Grove Village,
8 Illinois.

9 Q What types of waste did Premier Paints
10 generate that were disposed of at the two sites?

11 A Paints, varnishes and solvents.

12 Q How often did Premier Paints dispose of
13 waste at the two sites?

14 A Two to three trailer loads a year.

15 Q Over what approximate years did this
16 disposal by Premier Paint occur?

17 A 1972 until 1975.

18 Q Mr. Martell, do you know whether Proler-
19 Chicago disposed of waste at the Ninth Avenue site?

20 A No, they didn't.

21 Q Do you know whether Proler-Chicago disposed
22 of waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you know the location from which

1 Proler-Chicago generated waste that was disposed
2 of at U.S. Scrap?

3 A 36th and California Avenue, Chicago,
4 Illinois.

5 Q What types of waste did Proler-Chicago
6 generate that they disposed of at U.S. Scrap?

7 A Automobile seat cushions.

8 Q How often did Proler-Chicago dispose
9 of this waste at U.S. Scrap?

10 A Every day in this time frame.

11 Q What time frame is that?

12 A 1965 to 1968.

13 Q Do you know whether R.A. Briggs disposed
14 of waste at the Ninth Avenue site?

15 A Yes, they did.

16 Q Do you know whether R.A. Briggs disposed
17 of waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you know the location where R.A. Briggs
20 generated wastes that were then disposed of at the
21 two sites?

22 A 650 North Church Street, Lake Zurich,
23 Illinois.

24 Q What type of waste did R.A. Briggs

1 generate that was disposed of at the two sites?

2 A Solvents.

3 Q How often did R.A. Briggs dispose of
4 waste at the two sites?

5 A 1,500 gallons in a tanker twice a
6 month.

7 Q Over what approximate period of time
8 did this disposal by R.A. Briggs occur?

9 A 1973 to 1975.

10 Q Mr. Martell, do you know whether R-Lite
11 Chemical Coatings disposed of waste at the Ninth
12 Avenue site?

13 A Yes, they did.

14 Q Do you know whether R-Lite also disposed
15 of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you know the location where R-Lite
18 generated wastes that were disposed of at the two
19 sites?

20 A 411 South Union Street, Geneva, Illinois.

21 Q What is -- do you know the location --
22 I am sorry -- do you know the types of waste that
23 R-Lite generated that were later disposed of at
24 these sites?

1 A Paints and solvents.

2 Q Do you know how often R-Lite disposed
3 of wastes at these sites?

4 A I don't know at this time.

5 Q Do you know approximately the period of
6 time that R-Lite was disposing of waste at these
7 sites?

8 A 1973 to 1975.

9 Q Mr. Martell, do you know whether
10 R.R. Donnelly and Sons disposed of waste at the
11 Ninth Avenue site?

12 A Yes, they did.

13 Q Do you know whether R.R. Donnelly
14 disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you know the location where R.R.
17 Donnelly generated wastes that were disposed of
18 at the two sites?

19 A Mattoon, Illinois.

20 Q What types of waste did R.R. Donnelly
21 generate that were disposed of at these two
22 sites?

23 A Solvents and inks.

24 Q How often did R.R. Donnelly dispose of

1 waste at these sites?

2 A One to two trailer loads a month.

3 Q Over what approximate period of time did
4 this disposal occur?

5 A 1973 to 1975.

6 Q Do you know whether Rauland Tube Company
7 disposed of waste at the Ninth Avenue site?

8 A Yes, they did.

9 Q Do you know whether Rauland Tube also
10 disposed of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Mr. Martell, do you know if Rauland
13 Tube is associated with or a division of Zenith?

14 A I believe it is.

15 Q Do you know the location where Rauland
16 Tube generated wastes that were disposed of at the
17 two sites?

18 A 25th Avenue and North Avenue in Melrose
19 Park, Illinois.

20 Q What types of waste did Rauland Tube
21 generate that were disposed of at these sites?

22 A Acid, solvents, paints and oil.

23 Q How often did Rauland Tube dispose of
24 waste at the two sites?

1 A Three to four semi trailer loads of drums
2 a month.

3 Q Over what approximate period of time did
4 this disposal occur?

5 A 1972 to 1975.

6 Q Mr. Martell, going back a minute to
7 R.R. Donnelly, I missed something there.

8 Could you tell me again how often
9 R.R. Donnelly and Sons generated wastes that were
10 disposed of at the two sites mentioned?

11 A One to two trailer loads of drums a
12 month.

13 Q Mr. Martell, do you know whether
14 Reflector Hardward disposed of waste at the Ninth
15 Avenue site?

16 A Yes, they did.

17 Q Do you know whether Reflector Hardware
18 also disposed of waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q Do you know the location where Reflector
21 Hardware generated wastes that were disposed of at
22 these two sites?

23 A 1400 North 25th Avenue, Melrose Park,
24 Illinois.

1 Q What types of waste did Reflector Hardware
2 **generate** that were disposed of at these sites?

3 A Paints, solvents, varnishes and oils.

4 Q How often did Reflector Hardware dispose
5 of waste at these sites, if you know?

6 A One to two semi trailer loads of drums
7 a month.

8 Q Over what approximate period of time
9 did this disposal by Reflector Hardware occur?

10 A 1973 to 1975.

11 Q Do you know whether Regal Tube disposed
12 of waste at the Ninth Avenue site?

13 A Yes, they did.

14 Q Do you know whether Regal Tube was also
15 disposing of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you know the location where Regal
18 Tube generated wastes that were disposed of at
19 **these two sites?**

20 A Only that it's in Chicago. It's around
21 73rd Street, west 73rd Street in Chicago, west of
22 Cicero Avenue.

23 Q What types of waste did Regal Tube
24 **generate** that were disposed of at the two sites?

1 A Acid.

2 Q How often did Regal Tube dispose of waste
3 at these two sites?

4 A Five to six, 4,500 to 5,000 gallon tanker
5 loads a week.

6 Q Over what approximate period of time
7 did this disposal by Regal Tube occur?

8 A 1973 to 1975.

9 Q Mr. Martell, do you know whether
10 Reichhold Chemical disposed of waste at the Ninth
11 Avenue site?

12 A I don't remember at this time.

13 Q Do you know whether Reichhold Chemical
14 disposed of waste at the U.S. Scrap site?

15 A I don't remember at this time.

16 Q Mr. Martell, do you know whether Reliance
17 Electric disposed of waste at the Ninth Avenue
18 site?

19 A I don't remember at this time.

20 Q Do you know whether it -- Reliance Electric
21 disposed of waste at the U.S. Scrap site?

22 A I don't remember at this time.

23 Q Do you know whether Remington Arms Company
24 disposed of waste at the U.S. -- Ninth Avenue site?

1 A I don't remember at this time.

2 Q Do you know whether Remington Arms
3 disposed of waste at the U.S. Scrap site?

4 A I don't remember at this time.

5 Q Mr. Martell, do you know if Republic
6 Steel Corporation disposed of waste at the Ninth
7 Avenue site?

8 A No, they didn't.

9 Q Do you know whether Republic Steel
10 disposed of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Do you know the locations or location
13 where Republic Steel Company generated wastes
14 that were disposed of at U.S. Scrap?

15 A 116th South Burley Avenue, Chicago,
16 Illinois.

17 Q Would that be 11600?

18 A Right.

19 Q Okay. What type of waste did Republic
20 Steel generate that was disposed of at U.S. Scrap?

21 A Acid and tar.

22 Q How often did Republic Steel dispose of
23 waste at U.S. Scrap?

24 A One to two, 4,500 to 5,000 gallon tanker

1 loads a week.

2 Q Over what approximate period of time did
3 this type of disposal by Republic Steel Company
4 occur?

5 A 1969 to 1972.

6 Q Mr. Martell, do you know whether Resins,
7 Solvents and Varnishes Company disposed of wastes
8 at the Ninth Avenue site?

9 A No, they didn't.

10 Q Do you know whether Resins, Solvents and
11 Varnishes Company disposed of wastes at the U.S.
12 Scrap site?

13 A Yes, they did.

14 Q Do you know the location where Resins,
15 Solvents and Varnishes generated wastes that were
16 disposed of at the U.S. Scrap site?

17 A Chicago Heights.

18 Q What types of wastes did Resins, Solvents
19 and Varnishes generate that were disposed of at the
20 U.S. Scrap site?

21 A Solvents, inks, varnishes and resins like
22 their name.

23 Q How often did Resins, Solvents and Varnishes
24 dispose of wastes at those -- at that site?

1 A 30 to 50 drums a month.

2 Q Over what approximate period of time
3 did Resins, Solvents and Varnishes dispose of
4 waste at U.S. Scrap?

5 A 1965 to 1967.

6 Q Do you know whether Revere Brass disposed
7 of waste at the Ninth Avenue site?

8 A I don't remember at this time.

9 Q Do you know whether Revere Brass
10 disposed of waste at the U.S. Scrap site?

11 A I don't remember at this time.

12 Q Do you know whether Rex Chain disposed
13 of waste at the Ninth Avenue site?

14 A Yes, they did.

15 Q Do you know whether Rex Chain also
16 disposed of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you know whether Rex Chain is known
19 by any other name?

20 A I believe it's Rexnord.

21 Q Would that be R-e-x-n-o-r-d?

22 A I think so.

23 Q Do you know the location where Rex Chain
24 generated wastes that were disposed of at the two

1 sites?

2 A I don't know the exact street, but it's
3 off of Lincoln Avenue in Dolton, Illinois.

4 Q What type of wastes did Rex Chain generate
5 that was disposed of at these two sites?

6 A Oil.

7 Q How often did Rex Chain dispose of waste
8 at the two sites?

9 A 3,000 to 5,000 gallons in a tanker each
10 week.

11 Q Over what approximate period of time did
12 this disposal by Rex Chain occur?

13 A 1971 to 1975.

14 Q Mr. Martell, do you know whether Rexene
15 Polymers disposed of waste at the Ninth Avenue
16 site?

17 A Yes, they did.

18 Q Do you know whether Rexene also disposed
19 of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q What -- do you know the location where
22 Rexene generated wastes that were disposed of at
23 these two sites?

24 A It's either called Elwood, Illinois or

1 else it's Joliet, Illinois. They're next to each
2 other, but I think it's now called Elwood, Illinois.

3 Q What type of waste did Rexene generate
4 that was disposed of at these two sites?

5 A Polystyrene.

6 Q How often did Rexene dispose of waste
7 at these sites, if you know?

8 A One to two tanker loads a day, almost
9 every day including weekends.

10 Q How -- what size tanker loads would
11 these be, do you know?

12 A 4,000 to 5,000 gallon tanker loads.

13 Q Over what approximate period of time
14 did this disposal by Rexene occur?

15 A 1969 - 1975.

16 Q Do you know whether Richardson Graphics
17 disposed of waste at the Ninth Avenue site?

18 A Yes, they did.

19 Q Do you know whether Richardson Graphics
20 also disposed of waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q Do you know the location where Richardson
23 Graphics generated wastes that were disposed of at
24 the two sites?

1 9797 West 151st Street, Orland Park, Illinois.

2 Q What types of waste did Richardson
3 Graphics generate that were disposed of at the two
4 sites?

5 A Chemicals.

6 Q How often did Richardson Graphics dispose
7 of waste at these sites?

8 A One trailer load of drums every two to
9 three months.

10 Q Over what approximate period of time did
11 this disposal by Richardson Graphics occur?

12 A 1973 to 1975.

13 Q Mr. Martell, do you know whether Roper
14 Manufacturing Company disposed of waste at the
15 Ninth Avenue site?

16 A I don't remember at this time.

17 Q Do you know whether Roper Manufacturing
18 disposed of waste at the U.S. Scrap site?

19 A I don't remember at this time.

20 Q Do you remember, or do you know whether
21 Rust-Oleum disposed of waste at the Ninth Avenue
22 site?

23 A Yes, they did.

24 Q Do you know whether Rust-Oleum disposed

1 of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you know the location from which
4 Rust-Oleum generated wastes that were disposed
5 of at these two sites?

6 A 2301 Oakton Street, Evanston, Illinois.

7 Q What types of waste did Rust-Oleum
8 generate that were disposed of at the two sites,
9 if you know?

10 A Paints, varnishes and solvents.

11 Q How often did Rust-Oleum dispose of
12 waste at these sites?

13 A Normally three to four trailer loads of
14 drums a month. Once or twice there was an
15 accumulation where they disposed of two to three
16 trailers a day for a short period of time.

17 Q These would be trailer loads of drums,
18 is that correct?

19 A Yes, it is.

20 Q Over what approximate period of time
21 did this disposal by Rust-Oleum occur?

22 A 1972 to 1975.

23 Q Mr. Martell, do you know whether Scholle
24 Chemical disposed of waste at the Ninth Avenue site?

1 A Yes, they did.

2 Q Do you know whether Scholle Chemical
3 also disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q What is the location from which Scholle
6 Chemical generated wastes that were disposed of at
7 the two sites?

8 A 200 West North Avenue, North Lake,
9 Illinois.

10 Q What types of waste did Scholle Chemical
11 generate that were disposed of at the two sites?

12 A Solvents and coatings.

13 Q How often did Scholle Chemical dispose
14 of waste at those sites?

15 A Two to three trailer loads of drums a
16 year.

17 Q Over what years did this disposal by
18 Scholle occur?

19 A 1972 to 1975.

20 Q Do you know whether Scott, Inc., disposed
21 of waste at the Ninth Avenue Site?

22 A I don't remember at this time.

23 Q Do you know whether Scott, Inc., disposed
24 of waste at the U.S. Scrap site?

1 A I don't remember at this time.

2 Q Mr. Martell do you know whether Shakeproof
3 disposed of waste at the Ninth Avenue site?

4 A Yes, they did.

5 Q Do you know whether Shakeproof also
6 disposed of waste at the U.S. Scrap site?

7 A I m not sure.

8 Q Do you know whether Shakeproof is
9 associated with or a division of Illinois Tool
10 Works?

11 A I believe it is.

12 Q Do you know the location from which
13 Shakeproof generated wastes that were disposed of
14 at the Ninth Avenue site?

15 A Elgin, Illinois. I don't have the
16 street address.

17 Q Do you know what type of waste Shakeproof
18 generated that was disposed of at the Ninth Avenue
19 site?

20 A Oil.

21 Q Do you know how often Shakeproof generated
22 wastes that was disposed of at the Ninth Avenue
23 site?

24 A Don't know.

1 Q How about do you know the approximate
2 time period that Shakeproof disposed of waste?

3 A Not sure, but I think 1974 is one of the
4 years.

5 Q Mr. Martell, do you know whether Signode
6 disposed of waste at the Ninth Avenue site?

7 A Yes, they did.

8 Q Do you know whether Signode also
9 disposed of waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q Do you know the location where Signode
12 generated waste that was disposed of at these
13 two sites?

14 A 7701 West 71st Street, Bridgeview,
15 Illinois.

16 Q Do you know what type of waste Signode
17 generated that was later disposed of at the two
18 sites?

19 A Acid.

20 Q How often did Signode dispose of waste
21 at the two sites?

22 A Three to four tanker loads a month and
23 the tankers had either four to 5,000 gallons in
24 them.

1 Q What approximate period of time did
2 this cover?

3 A 1970, 1973.

4 Q Do you know Mr. Martell, whether Sigoli
5 Metal Plating disposed of waste at the Ninth Avenue
6 site?

7 A I don't remember at this time completely.

8 Q Do you know whether Sigoli Metal Plating
9 disposed of waste at the U.S. Scrap site?

10 A Oh, wait. If you want to back up, it
11 was over on this one. Now I don't know whether you
12 want to do it or not. Want to start over? I
13 see it's over here that this one here is screwed
14 up a little bit.

15 Q Mr. Martell, do you have a note on this
16 now that you recall something regarding Sigoli Metal
17 Plating?

18 A Yes, I do.

19 Q Do you know whether Sigoli Metal Plating
20 disposed of waste at the Ninth Avenue site?

21 A They did not.

22 Q Do you know whether Sigoli Metal Plating
23 disposed of any waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you know the address or location from
2 which Sigoli Metal Plating generated wastes that
3 were disposed of at the U.S. Scrap site?

4 A 2849 West Lake Street, Chicago, Illinois.

5 Q What type of waste, if you know, did
6 Sigoli generate that was disposed of at U.S. Scrap?

7 A Acid.

8 Q Do you know how often Sigoli generated
9 or disposed of waste at U.S. Scrap?

10 A No.

11 Q Do you know during what period of time
12 Sigoli disposed of waste at U.S. Scrap?

13 A Approximately 1969 to 1970.

14 Q Mr. Maretll, do you know whether Sinclair
15 and Valentine disposed of waste at the Ninth
16 Avenue site?

17 A No, they didn't.

18 Q Do you know whether Sinclair and Valentine
19 disposed of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you know the location where Sinclair
22 and Valentine generated wastes that were disposed
23 of at U.S. Scrap?

24 A 4101 South Pulaski Road, Chicago, Illinois.

1 Q Do you know what type of waste or what
2 types of waste Sinclair and Valentine generated
3 that were disposed of at U.S. Scrap?

4 A Inks, resins and varnishes.

5 Q How often did Sinclair and Valentine
6 dispose of waste at U.S. Scrap?

7 A 40 to 50 drums a month.

8 Q Over what approximate period of time did
9 this disposal by Sinclair and Valentine occur?

10 A 1965 to 1972.

11 Q Mr. Martell, do you know whether Size
12 Control disposed of waste at the Ninth Avenue
13 site?

14 A Yes, they did.

15 Q Do you know whether Size Control also
16 disposed of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q From what location did Size Control
19 generate wastes that were disposed of at these
20 two sites?

21 A 299 Bond Street, Elk Grove Village,
22 Illinois.

23 Q What types of waste did Size Control
24 generate that were disposed of at the two sites?

1 A Solvents and chemicals.

2 Q Do you know how often Size Control
3 disposed of waste at the two sites?

4 A 20 to 40 drums three to four times a
5 year.

6 Q During what approximate period of
7 time did this type of disposal occur?

8 A 1973 to 1975.

9 Q Do you know whether Skil Power Tool
10 disposed of waste at the Ninth Avenue site?

11 A Yes, they did.

12 Q Do you know whether Skil Power Tool
13 also disposed of waste at the U.S. Scrap
14 site?

15 A Yes, they did.

16 Q From what location did Skil Power Tool
17 generate wastes that were then disposed of at the
18 two sites?

19 A 1444 Wolf Road, Wheeling, Illinois.

20 Q What types of waste did Skil Power Tool
21 generate that were disposed of at the two sites?

22 A Paints and solvents.

23 Q How often did Skil Power Tool dispose of
24 waste at the sites, if you recall?

1 A 40 to 60 drums, three to four times a
2 year.

3 Q During what years approximately did
4 this disposal by Skill Power Tool occur?

5 A 1972 to 1975.

6 Q Mr. Martell, you've given the address --
7 the location as 1444 Wolf Road in Wheeling. Do
8 you feel confident of that address?

9 A After looking at another note, there is
10 a chance that I don't -- I'm not sure of the
11 exact address.

12 Q Mr. Martell, do you know whether Sommer
13 and Maca disposed of waste at the Ninth Avenue
14 site?

15 A Yes, they did.

16 Q Do you know whether Sommer and Maca also
17 disposed of waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q From what location did Sommer and Maca
20 generate wastes that were disposed of at the two
21 sites?

22 A 5501 West Ogden Avenue, Chicago, Illinois.

23 Q What types of waste did Sommer and Maca
24 generate that were then disposed of at the two sites?

1 A Oils and solvents.

2 Q Over what -- or how often did the disposal
3 of wastes at these two sites by Sommer and Maca
4 occur?

5 A 25 to 40 drums at a time, two to three
6 times a year.

7 Q During what approximate period of time
8 did this disposal occur?

9 A 1969 to 1975.

10 Q Do you know whether Specialty Coatings
11 disposed of waste at the Ninth Avenue Site?

12 A Yes, they did.

13 Q Do you know whether Specialty Coatings
14 also disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you know the location where Specialty
17 Coatings generated wastes that were disposed of
18 at the two sites?

19 A 2500 Delta Lane, Elk Grove Village,
20 Illinois.

21 Q What types of waste did Specialty Coatings
22 generate that were disposed of at the two sites?

23 A Paints, solvents, coatings and finishes.

24 Q How often did Specialty Coatings dispose

1 of waste at these two sites?

2 A Semi trailer load of drums three to
3 four times a year.

4 Q During what years did this disposal
5 by Specialty Coatings occur?

6 A 1972 to 1975.

7 Q Mr. Martell, do you recall, or do you
8 know whether Specified Plating disposed of waste
9 at the Ninth Avenue site?

10 A I don't remember at this time.

11 Q Do you know whether Specified Painting
12 disposed of waste at the Ninth Avenue site?

13 A I don't remember at this time.

14 Q Do you know whether Specified Plating
15 or Specified Painting disposed of waste at the
16 U.S. Scrap site?

17 A I don't remember at this time.

18 Q Do you know whether or not Spot Nails
19 disposed of waste at the Ninth Avenue site?

20 A Yes, they did.

21 Q Do you know whether Spot Nails disposed
22 of waste also at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you know the location where Spot Nails

1 generated wastes that were disposed of at the two
2 sites?

3 A 1100 Hicks Road, Rolling Meadows,
4 Illinois.

5 Q What types of waste did Spot Nails
6 generate that were disposed of at the two sites?

7 A Oil wash solution.

8 Q How often did Spot Nails dispose of
9 waste at these two sites?

10 A One to two tanker loads a month and
11 this would be about four to five thousand gallons
12 in a load.

13 Q Over what approximate period of time did
14 this disposal by Spot Nails occur?

15 A 1973 to 1975.

16 Q Mr. Martell, do you know whether
17 Standard T Chemical disposed of waste at the
18 Ninth Avenue site?

19 A Yes, they did.

20 Q Do you know whether Standard T Chemical
21 also disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you know the location or locations
24 where Standard T Chemical generated wastes that

1 were disposed of at these two sites?

2 A Yes, I do. The first one is the old
3 plant in Chicago, which is no longer there at
4 26th and Federal Street. The second plant is
5 at 10th Avenue and Washington Street in Chicago
6 Heights, Illinois.

7 Q What types of waste did Standard T
8 Chemical generate that were disposed of at these
9 two sites?

10 A Paints, solvents, varnishes and
11 coatings.

12 Q How often did Standard T Chemical
13 dispose of waste at the two sites?

14 A Approximately a total of three trailer
15 loads between the two plants per month.

16 Q Over what approximate period of time did
17 Standard T Chemical dispose of these wastes at
18 the site?

19 A 1965 to 1975.

20 Q Mr. Martell, do you know whether
21 Stauffer Chemical Company disposed of waste at
22 the Ninth Avenue site?

23 A Yes, they did.

24 Q Do you know whether Stauffer Chemical

1 also disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you know the location or locations
4 where Stauffer Chemical Company generated wastes
5 that were disposed of at the two sites?

6 A 11th and Arnold Streets, Chicago Heights,
7 Illinois.

8 Q What types of waste did Stauffer Chemical
9 Company generate that were disposed of at the two
10 sites?

11 A Unknown chemicals.

12 Q How often did Stauffer Chemical Company
13 dispose of waste at those sites?

14 A One to two trailer loads a month.

15 Q When you say "unknown Chemicals" do you
16 mean unknown to you?

17 A Yes.

18 Q Over what approximate period of time
19 did Stauffer Chemical dispose of waste at those
20 sites?

21 A 1972 to 1975.

22 Q When you said one to two trailer loads
23 a month, did that mean one to two trailer loads of
24 drums?

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1 A Yes.

2 Q Mr. Martell, do you know whether Stewart
3 Chemical Paint Company disposed of waste at the
4 Ninth Avenue site?

5 A No, they didn't.

6 Q Do you know whether Stewart Chemical Paint
7 Company disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know whether Stewart is S-t-u-a-r-t
10 or S-t-e-w-a-r-t?

11 A No, I don't.

12 Q Do you know the location where Stewart
13 generated wastes that were disposed of at the
14 U.S. Scrap site?

15 A 118th Street and Front Street. It's
16 Roseland, which is Chicago, Illinois.

17 Q What type of -- or types of waste
18 did Stewart generate that were disposed of later
19 at the U.S. Scrap site?

20 A 40 to 50 drums in a load, and there
21 were two or three drums or two or three loads
22 only.

23 Q That's the amount that they disposed
24 of?

1 A Yes, it is.

2 Q What type of waste did they dispose of?

3 A Paints and solvents.

4 Q Over what approximate period of time
5 did Stewart dispose of these wastes?

6 A 1969 - 1970.

7 Q Mr. Martell, do you know whether
8 Stewart Chemical and Stewart Industrial Coatings
9 may be the same company?

10 A No, I don't.

11 Q Do you know, Mr. Martell, whether
12 Stein-Hall generated or disposed of waste at
13 the Ninth Avenue site?

14 A Yes, they did.

15 Q Do you know whether Stein-Hall
16 disposed of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you know the location where
19 Stein-Hall generated wastes that were disposed
20 of at the two sites?

21 A 7351 South 78th Avenue, Bridgeview,
22 Illinois.

23 Q What types of waste did Stein-Hall
24 generate that were later disposed of at the two

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1 sites?

2 A Adhesives and chemicals.

3 Q How often did Stein-Hall dispose of
4 wastes at these sites?

5 A They disposed of 3,000 to 4,000 gallons
6 from a tank cleaning project, and they also
7 disposed of drums of chemicals, and I don't know
8 the volume of the drums.

9 Q Over what approximate period of time
10 did this disposal occur?

11 A 1972 to 1973.

12 Q Mr. Martell, do you know whether
13 Stressan-Reuter Company disposed of waste at the
14 Ninth Avenue site?

15 A Yes, they did.

16 Q Do you know whether Stressan-Reuter
17 Company disposed of waste at the U.S. Scrap
18 site?

19 A Wait a while.

20 Q Mr. Martell, did you want to correct
21 something here?

22 A Yes.

23 I am looking on one of my notes.

24 I see I made a mistake in saying that they disposed

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1 of material at the Ninth Avenue site, and that's
2 wrong.

3 Q Did Stressan-Reuter Company dispose of
4 waste at the U.S. Scrap site?

5 A Yes.

6 Q And from what location did Stressan-
7 Reuter Company generate waste that was disposed
8 of at the U.S. Scrap site?

9 A 400 West Roosevelt Avenue, Bensenville,
10 Illinois.

11 Q Mr. Martell, do you know whether
12 Stressan-Reuter Company may be a division or
13 associated with in some way Lawter Chemical?

14 A I'm not sure.

15 Q What types of waste did Stressan-Reuter
16 Company generate that were disposed of at U.S.
17 Scrap site?

18 A Varnishes, oils, resins and chemicals.

19 Q How often did Stressan-Reuter Company
20 dispose of these wastes at the U.S. Scrap site?

21 A 3,000 to 5,000 gallons a month in
22 tankers, and 50 to 60 drums a month in a trailer.

23 Q In a semi trailer, truck?

24 A By trailer.

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1 Q Over what approximate period of time
2 did this disposal by Stressan-Reuter Company
3 occur?

4 A 1965 - 1972.

5 Q Mr. Martell, do you know whether Stuart
6 Oil Company disposed of waste at the Ninth Avenue
7 site?

8 A Don't know at this time.

9 Q Do you know whether Stuart Oil Company
10 disposed of waste at the U.S. Scrap site?

11 A No, I don't remember at this time.

12 Q Mr. Martell, do you know whether Sun
13 Chemical disposed of waste at the Ninth Avenue
14 site?

15 A Yes, they did.

16 Q Do you know whether Sun Chemical
17 disposed of waste also at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you know the location or locations
20 where Sun Chemical generated wastes that were
21 disposed of at these two sites?

22 A Plants -- one plant is in North Lake,
23 Illinois. It's located at 135 West Lake Street.
24 Another plant is located in Bedford Park, and it's

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1 exact address is 6600 South Melvina. A third
2 plant is in Kankakee or close to Kankakee.

3 Q Taking the North Lake location first,
4 what types of waste did Sun Chemical generate
5 in the North Lake Location that were later
6 disposed of at the two sites?

7 A Inks, solvents, and resins.

8 Q How often approximately did Sun
9 Chemical dispose of waste from its North Lake
10 location at the site, if you know?

11 A One to three trailer loads a month of
12 drums.

13 Q Over what approximate period of time
14 did this disposal from the North Lake location
15 occur?

16 A 1965 - 1975.

17 Q What types of waste did Sun Chemicals
18 Bedford Park location generate that were disposed
19 of at the two sites?

20 A Inks, solvents and resins, same.

21 Q Is that also true of the Kankee location?

22 A No.

23 Q We will come to that later then. Over --
24 How often did the Bedford Park location dispose

1 of waste at the two sites?

2 A Two -- one to three trailer loads a
3 month.

4 Q All right. Of drums?

5 A Yes, of drums.

6 Q Over what approximate period of time
7 did this disposal occur?

8 A 1965 - 1975.

9 Q Then finally with the Kankakee location
10 what types of waste did that location generate
11 that were disposed of at the two sites?

12 A I believe that was inks and solvents.

13 Q How often did that Kankakee location
14 dispose of waste at these sites?

15 A I don't know.

16 Q Do you have any notation as to what
17 approximate period of time the Kankakee location
18 disposed of waste at the two sites?

19 A I don't remember at this time.

20 (Whereupon a brief recess was
21 taken.)

22

23

24

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1 MS. TIGHE: Should we begin again here?

2 Q Now, Mr. Martell, do you know whether
3 Technical Coatings disposed of waste at the Ninth Avenue
4 site?

5 A Yes, they did.

6 Q Do you know whether Technical Coatings also
7 disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q And by the way, do you know whether Technical
10 Coatings is associated with or a division of Benjamin
11 Moore?

12 A Yes, they are a division of Benjamin Moore
13 and Company.

14 Q Now, do you know the location where Technical
15 Coatings generated wastes that were disposed of at these
16 two sites?

17 A It's at the other end of the building that
18 Benjamin Moore is at. Where is that again? It's North
19 Avenue and 25th Avenue in Melrose Park, Illinois.

20 Q All right. Now, what types of waste did
21 Technical Coatings generate that were disposed of at the
22 two sites?

23 A Solvents.

24 Q And how often did Technical Coatings dispose

1 of wastes at these two sites, if you know?

2 A Four thousand to five thousand gallons in a
3 tanker each month.

4 Q And over what approximate period of time did
5 this disposal by Technical Coatings occur?

6 A 1969 to 1975.

7 Q All right. Mr. Martell, do you know whether
8 Terminal Transport disposed of waste at the Ninth Avenue
9 site?

10 A I'm not sure at this time.

11 Q Do you know whether Terminal Transport
12 disposed of waste at the U.S. Scrap site?

13 A I'm not sure at this time.

14 Q Do you know by any chance, Mr. Martell,
15 whether Terminal Transport might be known as, by some
16 other name?

17 A Possibly, but I'm not sure.

18 Q All right. Mr. Martell, do you know whether
19 the Texaco Company disposed of waste at the Ninth Avenue
20 site?

21 A Let's see. Yes.

22 Q And do you know whether Texaco also disposed
23 of waste at the U.S. Scrap site?

24 A Yes.

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1 Q And from what location did Texaco generate
2 waste that was disposed of at the two sites?

3 A Lockport, Illinois refinery.

4 Q And what types of waste did Texaco generate
5 that were disposed of at the two sites, if you know?

6 A Oil and gasoline sludge.

7 Q All right. And how often did Texaco dispose
8 of waste at the sites?

9 A A thousand to two thousand gallons of sludge
10 from cleaning out tanks at the refinery.

11 Q All right. And how -- over what approximate
12 period of time did this disposal occur?

13 A 1971 to 1973.

14 Q All right. Mr. Martell, do you know whether
15 Thompson Heywood Chemical disposed of waste at the Ninth
16 Avenue site?

17 A Don't remember at this time.

18 Q Do you know whether Thompson Heywood Chemical
19 disposed of waste at the U.S. Scrap site?

20 A Don't remember at this time.

21 Q Do you know whether Thor Power disposed of
22 waste at the Ninth Avenue site?

23 A Don't remember at this time.

24 Q Do you know whether Thor Power disposed of

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1 waste at the U.S. Scrap site?

2 A Don't remember at this time.

3 Q Do you know whether Travenol disposed of
4 waste at the Ninth Avenue site?

5 A Don't remember.

6 Q Do you know whether Travenol disposed of
7 waste at the U.S. Scrap site?

8 A Don't remember at this time.

9 Q Do you know whether Triple S Etchants
10 disposed of waste at the Ninth Avenue site?

11 A Don't remember at this time.

12 Q Do you know whether Triple S Etchants
13 disposed of waste at the U.S. Scrap site?

14 A Don't remember at this time.

15 Q All right. Do you know whether Triumph Twist
16 Drill disposed of waste at the Ninth Avenue site?

17 A No, they didn't.

18 Q Do you know whether Triumph Twist Drill
19 disposed of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you know the location where Triumph Twist
22 Drill generated waste that was disposed of at U.S. Scrap?

23 A Rhinelander, Wisconsin.

24 Q And what type of waste did Triumph generate

1 that was disposed of at U.S. Scrap?

2 A I believe it was solvents or oils.

3 Q And how often, if you know, did Triumph
4 dispose of waste at U.S. Scrap?

5 A One three-thousand gallon tank load only.

6 Q And when, approximately, did this disposal
7 occur?

8 A 1970 or 1971.

9 Q All right. Mr. Martell, do you know whether
10 U.S. Envelope disposed of waste at the Ninth Avenue site?

11 A Yes, they did.

12 Q And do you know whether U.S. Envelope also
13 disposed of waste at the U.S. Scrap site?

14 A I believe so.

15 Q Now, do you know the location where U.S.
16 Envelope generated wastes that were disposed of at these
17 two sites?

18 A The plant is located in North Chicago,
19 Illinois.

20 Q And what type of, types of waste did U.S.
21 Envelope generate that were later disposed of at the two
22 sites?

23 A Solvents, glues, and inks.

24 Q And how often did U.S. Envelope dispose of

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1 waste at these sites?

2 A Thirty to forty drums a month.

3 Q Over what approximate period of time did U.S.

4 Envelope dispose of these wastes at the site?

5 A '74 to '75.

6 Q All right. Do you know whether U.S.

7 Reduction Company disposed of wastes at the Ninth Avenue

8 site?

9 A Yes, they did.

10 Q Do you know whether U.S. Reduction disposed

11 also of wastes at the U.S. Scrap site?

12 A No, they didn't.

13 Q All right. Now, do you know the location

14 where U.S. Reduction generated wastes that were disposed

15 of at Ninth Avenue?

16 A Chicago Avenue and Kennedy Avenue in East

17 Chicago, Indiana.

18 Q And what type of waste did U.S. Reduction

19 generate that was disposed of at Ninth Avenue?

20 A Aluminum dust.

21 Q And how often did U.S. Reduction dispose of

22 this aluminum dust at Ninth Avenue?

23 A Five to ten truck loads a day.

24 Q And over what approximate period of time did

1 this disposal by U.S. Reduction occur?

2 A 1973 to 1975.

3 Q All right. Now, Mr. Martell, do you know
4 whether United States Steel, U.S. Steel, disposed of waste
5 at the Ninth Avenue site?

6 A I don't remember at this time.

7 Q Do you know whether U.S. Steel disposed of
8 waste at U.S. Scrap?

9 A I don't remember at this time.

10 MS. TIGHE: Off the record.

11 (A discussion was held
12 off the record.)

13 MS. TIGHE: Q All right. Mr. Martell, with regard
14 to your two answers, two previous answers on U.S. Steel,
15 did you think I was referring to the U.S. Steel Gary
16 works?

17 A Yes, I did.

18 Q All right. Are there any U.S. Steel
19 companies or U.S. Steel locations that you're aware of
20 that disposed of wastes at either the Ninth Avenue or the
21 U.S. Scrap sites?

22 A Yes, there are.

23 Q What U.S. -- what locations, what U.S. Steel
24 locations, disposed of waste at these two sites?

1 A U.S. Steel Products, 13700 South Harvard
2 Avenue, Dolton, Illinois, and U.S. Steel South Works, 3426
3 East 89th Street, Chicago, Illinois.

4 Q All right. Let's take the Harvard or the
5 Dolton location first.

6 Do you know whether that U.S. Steel
7 location in Dolton disposed of wastes at Ninth Avenue?

8 A Yes, they did.

9 Q Do you know whether that Dolton location also
10 disposed of wastes at U.S. Scrap?

11 A Yes, it did.

12 Q And what types of waste did the Dolton
13 location of U.S. Steel generate that were disposed of at
14 the two sites?

15 A Paint and solvents.

16 Q All right. And how often did the Dolton
17 location of U.S. Steel dispose of wastes at the two sites?

18 A Seventy to eighty drums a month.

19 Q And over what approximate period of time did
20 that disposal by the Dolton location occur?

21 A 1971-1975.

22 Q All right. Now, turning to the South Works
23 location, do you know whether the South Works location of
24 U.S. Steel disposed of waste at Ninth Avenue?

1 A No, they did not.

2 Q Do you know whether the South Works location
3 disposed of waste at U.S. Scrap?

4 A Yes, they did.

5 Q And what types of waste did the South Works
6 location generate that were disposed of at U.S. Scrap?

7 A One tanker load of four thousand gallons of
8 sulfuric acid.

9 Q And was this a one time disposal?

10 A Yes, it was.

11 Q And when approximately did that occur?

12 A Some time around 1971 or into 1972.

13 Q Okay. Mr. Martell, do you know whether Union
14 Camp disposed of waste at the Ninth Avenue site?

15 A Yes, they did.

16 Q Do you know whether Union Camp also disposed
17 of waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you know the location where Union Camp
20 generated wastes that were disposed of at these two sites?

21 A 100 Oakton Street, Des Plaines, Illinois.

22 Q And what types of waste did Union Camp
23 generate that were disposed of at the two sites?

24 A Inks, solvents, paints and oils.

1 Q How often did Union Camp dispose of waste at
2 these sites, if you know?

3 A I don't remember at this time.

4 Q Do you remember what approximate period of
5 time Union Camp disposed of waste at the sites?

6 A Approximately 1972 to 1973.

7 Q All right. Mr. Martell, do you know whether
8 Uniroyal, Inc. disposed of wastes at the Ninth Avenue
9 site?

10 A Yes, they did.

11 Q Do you know whether Uniroyal also disposed of
12 waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you know the location or locations where
15 Uniroyal generated wastes that were disposed of at these
16 two sites?

17 A Mishawaka, Indiana.

18 Q And what types of waste did Uniroyal generate
19 that were disposed of at these two sites?

20 A I believe it was solvents, adhesives and
21 plastics.

22 Q And how often did Uniroyal dispose of wastes
23 at these sites, if you know?

24 A Three to five hundred drums a month.

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1 Q Three to five hundred? Do you mean 3 to 500
2 or 300 to 500?

3 A Oh, 300 to 500.

4 Q I thought that was quite a spread.

5 A Three hundred to five hundred.

6 MS. TIGHE: Okay. Off the record.

7 (A discussion was held
8 off the record.)

9 MS. TIGHE: Back on the record.

10 Q Did Uniroyal dispose of any other amount of
11 waste besides the 300 to 500 drums a month?

12 A Once a week they had a four-thousand gallon
13 tanker load.

14 Q All right. And over what approximate period
15 of time did this disposal by Uniroyal occur?

16 A 1971 to 1975.

17 Q All right. Now, do you know, Mr. Martell,
18 whether United Wallpaper disposed of waste at the Ninth
19 Avenue site?

20 A No, they didn't.

21 Q Do you know whether United Wallpaper disposed
22 of waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you know whether United Wallpaper is

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1 associated in any way with DeSoto?

2 A Yes, they are a division.

3 Q All right.

4 A Or were a division, are, were.

5 Q All right. Now, do you know the location
6 from which United Wallpaper generated wastes that were
7 disposed of at the U.S. Scrap site?

8 A 3101 South Kedzie Avenue, Chicago, Illinois.

9 Q And what types of waste did United Wallpaper
10 generate that were disposed of at U.S. Scrap?

11 A Paste, paints and adhesives.

12 Q And over -- how often did United Wallpaper
13 dispose of wastes at these -- at the U.S. Scrap site?

14 A A total of 100 to 200 drums in the time
15 frame.

16 Q And what time frame would that be?

17 A 1965 to 1967.

18 Q All right. Mr. Martell, do you know whether
19 Valspar Corporation disposed of wastes at the Ninth Avenue
20 site?

21 A Yes, they did.

22 Q Do you know whether Valspar also disposed of
23 waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q And from what location did Valspar generate
2 wastes that were disposed of at these two sites?

3 A 200 Sawyer Street, Rockford, Illinois.

4 Q All right. And what types of waste did
5 Valspar generate that were disposed of at these two sites?

6 A Paints, thinners, solvents, varnishes, resins
7 and oils.

8 Q And how often did Valspar dispose of wastes
9 at these sites, if you know?

10 A Two to three trailer loads a month.

11 Q And would that be trailer loads of drums?

12 A Yes, it would.

13 Q And over what approximate period of time did
14 Valspar dispose of these wastes at these sites?

15 A 1965 to 1975.

16 Q All right. Mr. Martell, do you know whether
17 Vandercook disposed of wastes at the Ninth Avenue site?

18 A Don't remember at this time.

19 Q Do you know whether Vandercook disposed of
20 wastes at the U.S. Scrap site?

21 A Don't remember at this time.

22 Q All right. Mr. Martell, do you know whether
23 Velsicol Chemical disposed of waste at the Ninth Avenue
24 site?

1 A Yes, they did.

2 Q Do you know whether Velsicol Chemical
3 disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q And from what location did Velsicol Chemical
6 generate wastes that were disposed of at these two sites?

7 A 340 East Ohio Street in Chicago, and
8 approximately now, 3500 North Kimball Avenue.

9 Q Also in Chicago?

10 A Also Chicago.

11 Q So that was from two locations?

12 A Yes, it was.

13 Q All right. And were the types of wastes that
14 were generated the same for both locations?

15 A Yes, they were, I believe.

16 Q And what types of wastes were those that were
17 disposed of at the two sites?

18 A Insecticides, pesticides and biological
19 chemicals.

20 Q All right. And how often did Velsicol
21 dispose of wastes at the two sites, if you know?

22 A Twenty to fifty drums a month combined.

23 Q That would be the two sites combined?

24 A Yes, it would.

1 Q All right. And during what approximate
2 period of time did this disposal by Velsicol occur?

3 A 1966 to 1975.

4 Q All right. Mr. Martell, do you know whether
5 Venus Laboratories disposed of waste at the Ninth Avenue
6 site?

7 A Yes, they did.

8 Q And do you know whether Venus Laboratories
9 disposed of waste at the U.S. Scrap site?

10 A No, they didn't.

11 Q All right. Do you know the location from
12 which Venus Laboratories generated waste which was
13 disposed of at Ninth Avenue?

14 A 855 Lively Boulevard, Wood Dale, Illinois.

15 Q All right. And what type of -- what type or
16 types of waste did Venus generate that were disposed of at
17 Ninth Avenue?

18 A Some type of chemical.

19 Q And how often did Venus dispose of waste at
20 Ninth Avenue?

21 A One four-thousand to five-thousand gallon
22 tanker a month.

23 Q And over what period of time did this
24 disposal occur, if you know?

1 A 1974 to 1975.

2 Q All right. Now, Mr. Martell, do you know
3 whether Victor Gasket disposed of waste at the Ninth
4 Avenue site?

5 A Yes, they did.

6 Q Do you know whether Victor Gasket also
7 disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know the location where Victor Gasket
10 generated wastes that were disposed of at these two sites?

11 A 5750 West Roosevelt Road, Chicago, Illinois.

12 Q And what types of waste did Victor Gasket
13 generate that were disposed of at the two sites?

14 A Oils, solvents and chemicals.

15 Q And how often did Victor Gasket dispose of
16 wastes at these two sites?

17 A They disposed of 50 to 80 drums a month.

18 Q All right. Over what approximate period of
19 time did that disposal occur?

20 A 1969 to 1975.

21 Q All right. Mr. Martell, do you know whether
22 W.C. Richards disposed of waste at the Ninth Avenue site?

23 A I don't remember at this time.

24 Q Do you know whether W.C. Richards disposed of

1 waste at the U.S. Scrap site?

2 A I don't remember at this time.

3 Q Do you know whether William Wrigley, the
4 Wrigley Company, disposed of waste at the Ninth Avenue
5 site?

6 A I don't remember at this time.

7 Q Do you know whether the William Wrigley
8 company disposed of waste at the U.S. Scrap site?

9 A I don't remember at this time.

10 Q Okay. Do you know whether Warner Electric
11 disposed of waste at the -- off the record.

12 (A discussion was held
13 off the record.)

14 MS. TIGHE: Q Okay. Do you know whether Warner
15 Electric disposed of waste at the Ninth Avenue site?

16 A I don't remember at this time.

17 Q Do you know whether Warner Electric disposed
18 of waste at the U.S. Scrap site?

19 A Don't remember at this time.

20 Q How about Warwick Electronics? Do you know
21 whether Warwick Electronics disposed of wastes at the
22 Ninth Avenue site?

23 A Don't remember at this time.

24 Q Do you know whether Warwick Electronics

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1 disposed of wastes at the U.S. Scrap site?

2 A Don't remember at this time.

3 Q All right. Do you know whether Western
4 Electric disposed of waste at the Ninth Avenue site?

5 A No, they didn't, no.

6 Q Do you know whether Western Electric disposed
7 of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know the location where Western
10 Electric generated wastes that were disposed of at the
11 U.S. Scrap site?

12 A The Hawthorne Works, 22nd and Cicero Avenue,
13 Cicero, Illinois.

14 Q All right. And what types of waste did
15 Western Electric generate that were disposed of at U.S.
16 Scrap?

17 A Chlorinated solvents, acids, varnishes, oils,
18 paints and chemicals.

19 Q Okay. And how often, Mr. Martell, did
20 Western Electric dispose of wastes at U.S. Scrap?

21 A They disposed of 200 to 300 drums a month.

22 Q And over what approximate period of time did
23 that occur?

24 A Approximately 1965 until 1970.

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1 Q All right. Mr. Martell, do you know whether
2 Wilson Sporting Goods disposed of wastes at the Ninth
3 Avenue site?

4 A Don't remember at this time.

5 Q Do you know whether Wilson Sporting Goods
6 disposed of wastes at the U.S. Scrap site?

7 A Don't remember at this time.

8 Q Do you know whether Witco Chemical disposed
9 of waste at the Ninth Avenue site?

10 A Don't remember at this time.

11 Q Do you know whether Witco Chemical disposed
12 of waste at the U.S. Scrap site?

13 A Don't remember at this time.

14 Q Do you know whether Wyco Tool Company
15 disposed of wastes at the Ninth Avenue site?

16 A Don't remember at this time.

17 Q Do you know whether Wyco Tool Company
18 disposed of waste at the U.S. Scrap site?

19 A I don't remember at this time.

20 Q Do you know whether Wycoff Steel Company
21 disposed of wastes at the Ninth Avenue site?

22 A Let's see. Yes, yes. Wait, wait. I got the
23 wrong guy again.

24 Q This is Wycoff Steel.

1 A Okay. Yes.

2 Q Okay. Do you know whether Wycoff Steel also
3 disposed of waste at the U.S. Scrap site?

4 A Yes.

5 Q And what is the location where Wycoff Steel
6 generated wastes that were disposed of at these two sites?

7 A 3200 South Kedzie Avenue in Chicago,
8 Illinois.

9 Q And what types of waste did Wycoff Steel
10 generate that were disposed of at the two sites?

11 A Acid.

12 Q How often did Wycoff Steel dispose of waste
13 at these two sites?

14 A One to two four-thousand gallon tanker loads
15 a month.

16 Q And over what approximate period of time did
17 this disposal take place?

18 A I don't recall it at this time.

19 Q All right. Do you know whether Wyman Gordon
20 Company disposed of waste at the Ninth Avenue site?

21 A Yes, they did.

22 Q Do you know whether Wyman Gordon also
23 disposed of waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you know the location where Wyman Gordon
2 generated wastes that were later disposed of at these two
3 sites?

4 A 14600 South Wood Street, Harvey, Illinois.

5 Q And what type of wastes did Wyman Gordon
6 generate that was disposed of at these two sites?

7 A Acid.

8 Q How often did Wyman Gordon dispose of waste
9 at the sites, if you know?

10 A One four-thousand gallon tanker load
11 approximately every other month.

12 Q All right. And over what approximate period
13 of time did this disposal by Wyman Gordon occur?

14 A 1973 to 1975.

15 Q All right. Mr. Martell, do you know whether
16 the Xerox Corporation disposed of wastes at the Ninth
17 Avenue site?

18 A Yes, they did.

19 Q Do you know whether Xerox disposed of waste
20 at the U.S. Scrap site?

21 A Yes, they did.

22 Q And from what location did Xerox generate
23 wastes that were disposed of at these two sites?

24 A 18 -- oh, boy. Okay. 1808 Swift Drive, and

1 I think that's Oak Brook. It hasn't got it here, but I
2 think that's Oak Brook, Illinois.

3 Q Okay. And what type of waste or what types
4 of waste did Xerox generate that were disposed of at the
5 two sites?

6 A Chemicals, solvents and oils.

7 Q And how often did Xerox dispose of waste at
8 these sites, if you know?

9 A Five to ten drums a month.

10 Q And over what approximate period of time did
11 this disposal by Xerox occur?

12 A 1970-1975.

13 MS. TIGHE: All right, all right. Off the record.

14 (A discussion was held
15 off the record.)

16 MS. TIGHE: Q All right. Mr. Martell, do you know
17 whether Miller Pre-Pared potatoes disposed of waste at the
18 Ninth Avenue site?

19 A Yes, they did.

20 Q Do you know whether Miller also disposed of
21 waste at the U.S. Scrap site?

22 A No, they didn't.

23 Q All right. Do you know the location where
24 Miller generated wastes that were disposed of at Ninth

6
1 Avenue?

2 A 140th Street and Western Avenue, Posin,
3 Illinois.

4 Q And what type of waste did Miller generate
5 that was disposed of at Ninth Avenue?

6 A Potato waste.

7 Q And how often did Miller dispose of waste at
8 Ninth Avenue?

9 A They disposed of approximately 10,000 gallons
10 a year in tankers.

11 Q Okay. And over what approximate years did
12 this occur?

13 A 1975.

14 Q All right. Do you know whether Whiting
15 Corporation disposed of waste at the Ninth Avenue site?

16 A Yes, they did.

17 Q And do you know whether Whiting Corporation
18 also disposed of waste at the U.S. Scrap site?

19 A I don't think so.

20 Q All right. Now, do you know the location
21 where Whiting Corporation generated wastes that were
22 disposed of at Ninth Avenue?

23 A 157th and Lathrop Avenue, Harvey, Illinois.

24 Q And what type of waste did Whiting

1 Corporation generate that was disposed of at Ninth Avenue?

2 A Oil.

3 Q And how often did Whiting Corporation dispose
4 of this oil at Ninth Avenue?

5 A Three thousand to four thousand gallons in a
6 tanker approximately two to three times a year.

7 Q And over what approximate period of time are
8 we talking about?

9 A 1974-1975.

10 Q All right. Mr. Martell, do you know whether
11 Wilson and Company disposed of waste at the Ninth Avenue
12 site?

13 A No, I don't think so.

14 Q Do you know whether Wilson and Company
15 disposed of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q And what -- from what location did Wilson and
18 Company generate wastes that were disposed of at U.S.
19 Scrap?

20 A I believe it's Plumber Street and Wentworth
21 Avenue in Calumet City, Illinois.

22 Q And what type of waste did Wilson and Company
23 generate that was disposed of at U.S. Scrap?

24 A Some kind of chemicals.

1 Q And how often did Wilson and Company dispose
2 of these wastes at U.S. Scrap?

3 A Two to three four-thousand gallon tanker
4 loads a month.

5 Q And over what approximate period of time did
6 this disposal occur?

7 A 1971-1973.

8 Q All right. Do you know whether Ferro
9 Engineering disposed of waste at the Ninth Avenue site?

10 A They did not.

11 Q Do you know whether Ferro Engineering
12 disposed of waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q And do you know the location where Ferro
15 Engineering generated wastes that were disposed of at U.S.
16 Scrap?

17 A State and Burnham Road, Calumet City,
18 Illinois.

19 Q And what type of waste did Ferro Engineering
20 generate that was disposed of at U.S. Scrap?

21 A Some type of sludge.

22 Q Do you know what type of sludge?

23 A No, I don't.

24 Q And how often did Ferro dispose of sludge at

1 U.S. Scrap?

2 A They disposed of two thousand to three
3 thousand gallons in a tanker from cleaning out the pits in
4 the factory.

5 Q And over what approximate period of time did
6 this disposal occur?

7 A 1970-1971.

8 MS. TIGHE: All right. Off the record.

9 (A discussion was held
10 off the record.)

11 MS. TIGHE: Q Mr. Martell, do you know whether
12 Bulk Terminal generated waste that was disposed of at the
13 Ninth Avenue site?

14 A No, they didn't.

15 Q Do you know whether Bulk Terminal disposed of
16 waste at the U.S. Scrap site?

17 Off the record.

18 (A discussion was held
19 off the record.)

20 A Bulk Terminal or some other name, yes,
21 disposed of scrap at the U.S. Scrap site.

22 Q Are you having difficulty remembering the
23 name of the company?

24 A Yes.

1 Q Do you know the location where this company
2 that may be called Bulk Terminal generated waste that was
3 disposed of at U.S. Scrap?

4 A Approximately 124th and Stoney Island Avenue,
5 Chicago, Illinois.

6 Q All right. Now, what type of waste did this
7 company generate that was disposed of at U.S. Scrap?

8 A It was semi-tank trailer cleaning waste of
9 chemicals.

10 Q All right. How often did this disposal occur
11 at U.S. Scrap?

12 A Two to three 5000-gallon tankers a week.

13 Q All right. And over what approximate period
14 of time did this disposal occur?

15 A '66 to '69.

16 Q All right. And are you going to try to check
17 to determine what that name is, then, Mr. Martell?

18 A Yeah, I think it's terminal transport. See,
19 I don't think it's Bulk Terminal. I think we're wrong.

20 Q Okay.

21 A But we'll do some checking. It's not very
22 far, you know.

23 MR. KOWALSKI: It's right there along the Calumet.

24 THE WITNESS: You can throw a rock at it almost.

1 MS. TIGHE: Off the record.

2 (A discussion was held

3 off the record.)

4 (A recess was taken.)

5

6 MS. TIGHE: Q Mr. Martell, do you know whether
7 Accutronics disposed of waste at the Ninth Avenue site?

8 A I don't remember at this time.

9 Q Do you know whether Accutronics disposed of
10 waste at the U.S. Scrap site?

11 A I don't remember at this time.

12 Q Do you know whether Acme Steel Company
13 disposed of waste --

14 A We did that.

15 Q No.

16 A We did it as Interlake.

17 Q Well, you have to tell me that. You have to
18 tell me that you think --

19 Off the record.

20 (A discussion was held

21 off the record.)

22 MS. TIGHE: On the record.

23 Q Do you know whether Acme Steel Company
24 disposed of waste at the Ninth Avenue site?

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1 A No, they didn't.

2 Q Do you know whether Acme Steel Company
3 disposed of waste at the U.S. Scrap site?

4 A Actually, Acme Steel is Interlake Steel, and
5 I think we did this more or less.

6 Q Okay. Fine.

7 Do you know whether Active Service
8 disposed of waste at the Ninth Avenue site?

9 A I don't remember at this time.

10 Q Do you know whether Active Service disposed
11 of waste at the U.S. Scrap site?

12 A I don't remember at this time.

13 Q Do you know whether Advance Transformer
14 disposed of waste at the Ninth Avenue site?

15 A Yes, they did.

16 Q And do you know whether Advance Transformer
17 also disposed of waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q And from what location did Advance
20 Transformer generate wastes that were disposed of at the
21 two sites?

22 A 2950 North Western Avenue in Chicago,
23 Illinois.

24 Q All right. And what types of waste did

1 Advance Transformer generate that were disposed of at the
2 two sites?

3 A Oils and other chemicals.

4 Q Okay. How often did Advance Transformer
5 dispose of waste at these two sites, if you know?

6 A Approximately 40 to 50 drums every two or
7 three months.

8 Q And over what approximate period of time did
9 Advance Transformer dispose of wastes at these sites?

10 A 1970 to 1973.

11 Q All right. Mr. Martell, do you know whether
12 Albany disposed of waste at the Ninth Avenue site?

13 A Don't remember at this time.

14 Q Do you know whether Albany disposed of wastes
15 at the U.S. Scrap site?

16 A Don't remember at this time.

17 Q Mr. Martell, do you know whether Alco-Gravier
18 disposed of waste at the Ninth Avenue site?

19 A Yes, they did.

20 Q Do you know whether Alco-Gravier also
21 disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you know the location where Alco-Gravier
24 generated wastes that were disposed of at the two sites?

1 A Approximately 16th street and Western Avenue
2 in Chicago, Illinois.

3 Q And do you know what types of waste
4 Alco-Gravier generated that were disposed of at the two
5 sites?

6 A Inks, solvents and oils.

7 Q How often did Alco-Gravier dispose of waste
8 at those sites, if you know?

9 A I'm not sure, I'm not sure.

10 Q Are you -- do you know over what approximate
11 period of time Alco-Gravier disposed of waste at the
12 sites?

13 A Approximately 1970 to 1975.

14 Q All right. Do you know whether Allis
15 Chalmers disposed of wastes at the Ninth Avenue site?

16 A Yes, they did.

17 Q Do you know whether Allis Chalmers also
18 disposed of waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q Do you know the location or locations where
21 Allis Chalmers generated wastes that were disposed of at
22 the two sites?

23 A 151st Street and Halsted Street, Harvey,
24 Illinois.

1 Q And what types of waste did Allis Chalmers
2 generate that were disposed of at the two sites?

3 A Coolant oil.

4 Q How often did Allis Chalmers dispose of waste
5 at these sites?

6 A Three-thousand gallon tanker one to two times
7 a week.

8 Q And over what approximate period of time did
9 Allis Chalmers dispose of waste at these sites?

10 A 1973-1975.

11 MS. TIGHE: All right. Off the record.

12 (A discussion was held
13 off the record.)

14 MS. TIGHE: Q Mr. Martell, do you know whether
15 American Name Plate disposed of wastes at the Ninth Avenue
16 site?

17 A Yes, they did.

18 Q Do you know whether American Name Plate also
19 disposed of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you know the location where American Name
22 Plate generated wastes that were disposed of at the two
23 sites?

24 A 4104 South Kildare Avenue, Chicago, Illinois.

1 Q And what types of waste did American Name
2 Plate generate that were disposed of at these two sites?

3 A Solvents.

4 Q How often did American Name Plate dispose of
5 waste at these sites?

6 A Forty to fifty drums a month -- 40 to 50
7 drums about every two or three months.

8 Q Okay. And over what approximate period of
9 time did this disposal by American Name Plate occur?

10 A It's 1973-1975.

11 Q Mr. Martell, do you know whether American
12 Printer Magazine disposed of wastes at the Ninth Avenue
13 site?

14 A I don't remember at this time.

15 Q Do you know whether American Printer Magazine
16 disposed of waste at the U.S. Scrap site?

17 A I don't remember at this time.

18 Q Do you know whether American Rivet
19 disposed -- off the record.

20 (A discussion was held
21 off the record.)

22 MS. TIGHE: Back on.

23 Q Do you know whether American Rivet disposed
24 of wastes at the Ninth Avenue site?

1 A Yes, they did.

2 Q Do you know whether American Rivet disposed
3 of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q And from what location did American Rivet
6 generate wastes that were disposed of at the two sites?

7 A 11330 West Melrose street, Franklin Park,
8 Illinois.

9 Q What types of waste did American Rivet
10 generate that were disposed of at the two sites, if you
11 know?

12 A Coolant oil.

13 Q And how often did American Rivet dispose of
14 wastes at these two sites?

15 A Oh, 30 to 40 drums every two or three months.

16 Q And over what approximate period of time did
17 this disposal by American Rivet occur?

18 A 1968 to 1975.

19 Q All right. Do you know whether Anderson
20 Manufacturing disposed of wastes at the Ninth Avenue site?

21 A Yes, they did.

22 Q Do you know whether Anderson Manufacturing
23 also disposed of waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q And from what location did American -- did
2 Anderson Manufacturing generate wastes that were disposed
3 of at the two sites?

4 A Michigan City, Indiana, I believe.

5 Q All right. What types of waste did Anderson
6 Manufacturing generate that were disposed of at these two
7 sites?

8 A Oils, solvents and varnishes.

9 Q And how often did Anderson Manufacturing
10 dispose of wastes at these sites?

11 A I'm not sure.

12 Q Do you know over what approximate period of
13 time Anderson Manufacturing disposed of wastes at these
14 sites?

15 A I believe 1973 to 1975.

16 Q All right. Mr. Martell, do you know whether
17 APPCO metal disposed of wastes at the Ninth Avenue site?

18 A I don't remember at this time.

19 (A discussion was held
20 off the record.)

21 MS. TIGHE: All right. Back on.

22 Q Mr. Martell, do you know whether Appco Metal
23 Finishing disposed of waste at the U.S. Scrap site?

24 A I don't remember at this time.

1 MS. TIGHE: Off the record again.

2 (A discussion was held
3 off the record.)

4 MS. TIGHE: All right. Let's go on.

5 Q Mr. Martell, do you know whether Armstrong
6 Chemical disposed of waste at the Ninth Avenue site?

7 A Yes.

8 Q Did they?

9 A Oh, yes, they did.

10 Q And do you know whether Armstrong Chemical
11 also disposed of waste at the U.S. Scrap site?

12 A I don't think so.

13 Q All right. Do you know the location where
14 Armstrong Chemical generated wastes that were disposed of
15 at the Ninth Avenue site?

16 A 5108 South Western Boulevard, Chicago,
17 Illinois.

18 Q And what types of waste did Armstrong
19 Chemical generate that were disposed of at the Ninth
20 Avenue site?

21 A I'm not sure.

22 Q Do you know how often Armstrong Chemical
23 disposed of wastes at Ninth Avenue?

24 A Not sure.

1 Q Do you know over what approximate period of
2 time Armstrong Chemical disposed of wastes at Ninth
3 Avenue?

4 A I think 1974, somewhere in that area.

5 Q All right. Mr. Martell, do you know whether
6 Avon disposed of wastes at the Ninth Avenue site?

7 A I don't remember at this time.

8 Q Do you know whether Avon disposed of wastes
9 at the U.S. Scrap site?

10 A Don't remember at this time.

11 Q Do you know whether B and J Plastics
12 Manufacturing disposed of wastes at the Ninth Avenue site?

13 A Don't remember at this time.

14 Q Do you know whether B and J Manufacturing
15 disposed of waste at the U.S. Scrap site?

16 A Don't remember at this time.

17 MR. KOWALSKI: Off the record.

18 (A discussion was held
19 off the record.)

20 MS. TIGHE: Q Mr. Martell, do you know whether B
21 and T Plastics Manufacturing disposed of wastes at the
22 Ninth Avenue site?

23 A I don't remember at this time.

24 MS. TIGHE: Off the record.

1 (A discussion was held
2 off the record.)

3 MS. TIGHE: Q Mr. Martell, do you know whether B
4 and T Plastics Manufacturing disposed of wastes at the
5 U.S. Scrap site?

6 A I don't remember at this time.

7 Q Mr. Martell, do you know whether Robert Baich
8 was a generator of waste at the Ninth Avenue site?

9 A No.

10 Q Do you know whether --

11 A He wasn't, he wasn't.

12 Q Do you know whether Robert Baich was a
13 generator of waste at the U.S. Scrap site?

14 A No, he wasn't.

15 Q Mr. Martell, do you know whether Betz Lab
16 disposed of wastes at the Ninth Avenue site?

17 A I don't remember at this time.

18 Q Do you know whether Betz Lab disposed of
19 waste at the U.S. Scrap site?

20 A I don't remember at this time.

21 Q All right. Do you know, Mr. Martell, whether
22 Boyar Schultz disposed of waste at the Ninth Avenue site?

23 A Yes, they did.

24 Q Do you know whether Boyar Schultz disposed of

1 waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q And from what location did Boyar waste
4 generate -- did Boyar Schultz generate wastes that were
5 disposed of at the two sites?

6 A 702 Main Street in Rockford, Illinois.

7 Q And what type of waste or types of waste did
8 Boyar Schultz generate that were disposed of at these two
9 sites?

10 A Paints, solvents and varnish.

11 Q And how often did Boyar Schultz dispose of
12 waste at these two sites?

13 A I don't know at this time.

14 Q And over what approximate period of time did
15 Boyar Schultz dispose of wastes, if you know?

16 A 1973 to 1975.

17 Q All right. Mr. Martell, do you know whether
18 Bruce Horn disposed of wastes at the Ninth Avenue site?

19 A I don't remember at this time.

20 Q Do you know whether Bruce Horn disposed of
21 wastes at the U.S. Scrap site?

22 A I don't remember at this time.

23 Q Do you now whether Calumet Screw Machine
24 Products disposed of wastes at the Ninth Avenue site?

1 A I don't remember at this time.

2 Q Do you know whether Calumet Screw Machine
3 Products disposed of waste at the U.S. Scrap site?

4 A I don't remember at this time.

5 Q Do you know, Mr. Martell, whether Cellofilm
6 Corporation disposed of waste at the Ninth Avenue site?

7 A I don't remember at this time.

8 Q Do you know whether Cellofilm Corporation
9 disposed of waste at the U.S. Scrap site?

10 A Don't remember at this time.

11 Q Do you know whether Central National Bank
12 Land Trust 7711 disposed of waste at the Ninth Avenue
13 site?

14 A I don't remember at this time.

15 Q Do you know whether Central National Bank
16 Land Trust 7711 disposed of waste at the U.S. Scrap site?

17 A I don't remember did it.

18 Q Do you have, Mr. Martell, a land trust at
19 that bank?

20 A I think, but I'm not sure.

21 Q All right. Do you know, Mr. Martell, whether
22 Central Scientific disposed of waste at the Ninth Avenue
23 site?

24 A I don't remember at this time.

1 Q Do you know whether Central Scientific
2 disposed of waste at the U.S. Scrap site?

3 A Don't remember at this time.

4 Q Do you know whether Central Solvent disposed
5 of waste at the Ninth Avenue site?

6 A We didn't do that one, huh?

7 MR. KOWALSKI: Off the record.

8 (A discussion was held
9 off the record.)

10 MS. TIGHE: Q Mr. Martell, did we already discuss
11 Central Solvents?

12 A Yes, we did.

13 Q All right. Moving on then, do you know
14 whether Chem Trust disposed of waste at the Ninth Avenue
15 site?

16 A I don't remember at this time.

17 Q Do you know whether Chem Trust disposed of
18 waste at the U.S. Scrap site?

19 A I don't remember at this time.

20 MS. TIGHE: All right. Off the record.

21 (A discussion was held
22 off the record.)

23 MS. TIGHE: Okay. Back on.

24 Q Mr. Martell, do you know whether Chicago

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1 Adhesive disposed of waste at the Ninth Avenue site?

2 A Yes, they did.

3 Q Do you know whether Chicago Adhesive also
4 disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you know the location where Chicago
7 Adhesive generated wastes that were disposed of at these
8 two sites?

9 A 4758 West 60th Street Chicago, Illinois.

10 Q And Mr. Martell, what types of waste did
11 Chicago Adhesive generate that were disposed of at the two
12 sites?

13 A Solvents, adhesives and glues.

14 Q All right. And how often did Chicago
15 adhesive dispose of wastes at the two sites, if you know?

16 A Thirty to fifty drums at a time, one to two
17 times a year.

18 Q All right. And over what approximate period
19 of years did Chicago Adhesives dispose of wastes at the
20 two sites?

21 A 1972 to 1975.

22 Q Okay. Mr. Martell, do you know whether
23 Chicago Metals disposed of wastes at the Ninth Avenue
24 site?

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1 A Don't remember at this time.

2 Q Do you know whether Chicago Metals disposed
3 of wastes at the U.S. Scrap site?

4 A Don't remember at this time.

5 Q All right. Mr. Martell, do you know whether
6 Chicago Rotoprint Company --

7 (A discussion was held
8 off the record.)

9 MS. TIGHE: All right. I withdraw that. Back on.

10 Q Mr. Martell, do you know whether Frank
11 Chirrillo generated waste that went to the Ninth Avenue
12 site?

13 A No, he didn't.

14 Q Do you know whether he generated waste that
15 went to the U.S. Scrap site?

16 A No, he didn't.

17 Q Do you know, Mr. Martell, whether Commercial
18 Solvents disposed of waste at the Ninth Avenue site?

19 (A discussion was held
20 off the record.)

21 MS. TIGHE: Q The question, Mr. Martell, was
22 whether -- if you knew whether Commercial Solvents the
23 disposed of waste at the Ninth Avenue site.

24 A I don't remember at this time.

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1 Q Do you know whether Commercial Solvents
2 generated or disposed of waste at the U.S. Scrap site?

3 A I don't remember at this time.

4 Q Do you know whether Conservative Chemical
5 disposed of waste at the Ninth Avenue site?

6 A I don't remember at this time.

7 Q Do you know whether Conservative Chemical
8 disposed of waste at the U.S. Scrap site?

9 A I don't remember at this time.

10 Q Do you know whether Continental Cleaning
11 disposed of waste at the Ninth Avenue site?

12 A Don't remember at this time.

13 Q Do you know whether Continental Cleaning
14 disposed of waste at the U.S. Scrap site?

15 A I don't remember at this time.

16 Q All right. Now, we have already discussed, I
17 believe, Mr. Martell, Continental White Cap, is that
18 correct?

19 A Right.

20 Q All right. Do you know, Mr. Martell, whether
21 Contour Saws disposed of waste at the Ninth Avenue site?

22 A Don't remember at this time.

23 Q Do you know whether Contour Saws disposed of
24 waste at the U.S. Scrap site?

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1 A Don't remember at this time.

2 Q Do you know whether Cook County Hospital
3 disposed of waste at the Ninth Avenue site?

4 A Don't remember at this time.

5 Q Do you know whether Cook County Hospital
6 disposed of waste at the U.S. Scrap site?

7 A Don't remember at this time.

8 Q Mr. Martell, do you remember -- do you know
9 whether Kroname disposed of waste at the Ninth Avenue
10 site?

11 A Yes, they did.

12 Q Do you know whether Kroname also disposed of
13 waste at U.S. Scrap site?

14 A Yes, they did.

15 Q Now, do you know the location where Kroname
16 generated wastes that were disposed of at the two sites?

17 A 2055 Ruby Street, Melrose Park, Illinois.

18 Q And what types of waste did Kroname generate
19 that were disposed of at the two sites?

20 A Acid.

21 Q And how often did Kroname dispose of waste at
22 these two sites, if you know?

23 A Three thousand gallons in a tanker, one to
24 two times a month.

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1 Q And over what approximate period of time did
2 this disposal by Kroname occur?

3 A 1972 to 1975.

4 Q All right. Mr. Martell, do you know whether
5 Culligan Fire Protection, Inc. generated -- disposed of
6 waste at the Ninth Avenue site?

7 A I don't remember at this time.

8 Q Do you know whether Culligan Fire Protection,
9 Inc. disposed of waste at the U.S. Scrap site?

10 A I don't remember at this time.

11 MS. TIGHE: All right. Off the record.

12 (A discussion was held
13 off the record.)

14 MS. TIGHE: Back on.

15 Q Mr. Martell, do you know whether Cuneo
16 Solvents disposed of waste at the Ninth Avenue site?

17 A I don't remember at this time.

18 Q Do you know whether Cuneo Solvents disposed
19 of waste at the U.S. Scrap site?

20 A I don't remember at this time.

21 Q Do you know whether Custom Metals Processing,
22 Inc. disposed of waste at the Ninth Avenue site?

23 A I don't remember at this time.

24 Q Do you know whether Custom Metals Processing,

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1 Inc. disposed of waste at the U.S. Scrap site?

2 A Don't remember at this time.

3 Q Do you know whether Delaware Plastics
4 disposed of waste at the Ninth Avenue site?

5 A Don't remember at this time.

6 Q Do you know whether Delaware Plastics
7 disposed of waste at the U.S. Scrap site?

8 A Don't remember at this time.

9 Q Do you know whether Desa --

10 A We did Desa, didn't we?

11 MR. KOWALSKI: Uh-uh.

12 MS. TIGHE: Q Do you know whether Desa Industries
13 disposed of wastes at the Ninth Avenue site?

14 A Yes, they did.

15 Q And do you know whether Desa Industries also
16 disposed of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q And from what location did Desa Industries
19 generate wastes that were disposed of at these two sites?

20 A 15000 South Western Avenue, Park Forest,
21 Illinois.

22 Q And what types of waste did Desa Industries
23 generate that were disposed of at these two sites?

24 A Gasoline and oil.

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1 Q How often did Desa Industries dispose of
2 waste at these sites, if you know?

3 A Not sure.

4 Q Do you know over what approximate period of
5 time Desa disposed of waste at these sites?

6 A 1972 to 1975.

7 Q Okay. Mr. Martell, do you know whether
8 Dublin Company disposed of wastes at the Ninth Avenue
9 site?

10 A Don't remember at this time.

11 Q Do you know whether Dublin Company disposed
12 of wastes at the U.S. Scrap site?

13 A Don't remember at this time.

14 Q Do you know whether Dutone disposed of wastes
15 at the Ninth Avenue site?

16 A Don't remember at this time.

17 Q Do you know whether Dutone disposed of wastes
18 at the U.S. Scrap site?

19 A Don't remember at this time.

20 Q Mr. Martell, do you know whether Elgin
21 Machine disposed of waste at the Ninth Avenue site?

22 A Don't remember at this time.

23 Q Do you know whether Elgin Machine disposed of
24 waste at the U.S. Scrap site?

1 A Don't remember at this time.

2 MS. TIGHE: Off the record.

3 (A discussion was held
4 off the record.)

5 MS. TIGHE: All right. Let's go back on now.

6 Q Mr. Martell, do you know whether Federal Tool
7 and Plastics disposed of waste at the Ninth Avenue site?

8 A Don't remember at this time.

9 Q Do you know whether Federal Tool and Plastics
10 disposed of waste at the U.S. Scrap site?

11 A Don't remember at this time.

12 Q All right. Mr. Martell, do you know -- do
13 you know whether Ford Motor Company disposed of waste at
14 the Ninth Avenue site?

15 A I don't remember at this time.

16 MS. TIGHE: Off the record.

17 (A discussion was held
18 off the record.)

19 MS. TIGHE: All right. Back on.

20 Q Do you know Mr. Martell, whether Ford Motor
21 Company disposed of waste at the U.S. Scrap site?

22 A I don't remember at this time.

23 Q Do you know whether Frank J. Curran Company
24 disposed of waste at the Ninth Avenue site?

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1 A I don't remember at this time.

2 Q Do you know whether Frank J. Curran disposed
3 of waste at the U. S. Scrap site?

4 A Don't remember at this time.

5 Q Do you know, Mr. Martell, whether Gard,
6 Inc. --

7 A That's industries, I-n-d.

8 Q -- Gard Industries disposed of waste at the
9 Ninth Avenue site?

10 A I don't remember at this time.

11 Q Do you know whether Gard Industries disposed
12 of waste at the U.S. Scrap site?

13 A I don't remember at this time.

14 Q All right. Do you know whether Handschy
15 Chemical had disposed of waste at the Ninth Avenue site?

16 A I don't remember, really, at this time.

17 Q Do you know whether Handschy Chemical
18 disposed of waste at the U.S. Scrap site?

19 A I don't remember at this time.

20 MS. TIGHE: Off the record.

21 (A discussion was held
22 off the record.)

23 MS. TIGHE: Okay. On the record.

24 Q Mr. Martell, do you know whether Hausner Hard

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1 Chrome disposed of waste at the Ninth Avenue site?

2 A I don't remember at this time.

3 Q Do you know whether Hausner Hard Chrome
4 disposed of waste at the U.S. Scrap site?

5 A I don't remember at this time.

6 Q Do you know whether Heat Bath Corporation
7 disposed of waste at the Ninth Avenue site?

8 A I don't remember at this time.

9 Q Do you know whether Heat Bath Corporation
10 disposed of waste at the U.S. Scrap site?

11 A I don't remember at this time.

12 Q Mr. Martell, do you know whether Hooker Glass
13 disposed of waste at the Ninth Avenue site?

14 A No, they didn't.

15 Q Do you know whether Hooker Glass disposed of
16 waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you know the location from which Hooker
19 Glass generated waste which was disposed of at the U.S.
20 Scrap site?

21 A East Washington Boulevard and approximately
22 on the east side of the Dan Ryan Expressway between the
23 Dan Ryan Expressway and that first street that goes south,
24 whatever that is. I don't know if that's Des Plaines or

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1 Clinton.

2 Q Okay. Here in Chicago?

3 A Chicago, Illinois.

4 Q All right. And what types of waste did
5 Hooker Glass generate that were disposed of at U.S. Scrap?

6 A Paints and solvents.

7 Q How often did Hooker Glass dispose of these
8 wastes at U.S. Scrap?

9 A Thirty to fifty drums at a time two to three
10 times a year.

11 Q All right. And over what approximate period
12 of time did this disposal by Hooker Glass occur?

13 A 1970 to 1971.

14 MS. TIGHE: All right. Off the record.

15 (A discussion was held
16 off the record.)

17 MS. TIGHE: Okay. On the record.

18 Q Mr. Martell, do you know whether IMF, Inc. is
19 the same thing as International Multi Foods?

20 A No, I don't.

21 Q Okay. Do you know whether IMF, Inc. disposed
22 of waste at the Ninth Avenue site?

23 A I don't know at this time.

24 Q Do you know whether IMF, Inc. disposed of

1 waste at the U.S. Scrap site?

2 A I don't know at this time.

3 Q All right. Now, Mr. Martell, do you know
4 whether Inland Steel Company disposed of waste at the
5 Ninth Avenue site?

6 A I don't know at this time.

7 Q Do you know whether Inland Steel disposed of
8 waste at the U.S. Scrap site?

9 A I don't know at this time.

10 Q Do you know whether Intaglio Service disposed
11 of waste at the Ninth Avenue site?

12 A I don't remember at this time.

13 Q Do you know whether Intaglio Service disposed
14 of waste at the U.S. Scrap site?

15 A I don't remember at this time.

16 Q All right. Mr. Martell, do you know whether
17 J and S Tin Mill Products Company, Inc. disposed of waste
18 at the Ninth Avenue site?

19 A Don't remember at this time.

20 Q Do you know whether J and S Tin Mill Products
21 disposed of waste at the U.S. Scrap site?

22 A I don't remember at this time.

23 Q All right. Mr. Martell, do you know whether
24 John L. Armitage disposed of waste at the Ninth Avenue

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1 site?

2 A I don't remember at this time.

3 Q Do you know whether John L. Armitage disposed
4 of waste at the U.S. Scrap site?

5 A Don't remember at this time.

6 Q Do you know whether Kerr Chemical disposed of
7 waste at the Ninth Avenue site?

8 A Don't remember at this time.

9 Q Do you know whether Kerr Chemical disposed of
10 waste at the U.S. Scrap site?

11 A Don't remember at this time.

12 Q Do you know whether KMS Industries disposed
13 of waste at the Ninth Avenue site?

14 A Don't remember at this time.

15 Q Do you know whether KMS Industries disposed
16 of waste at the U.S. Scrap site?

17 A Don't remember at this time.

18 Q All right. Do you know whether Liquid
19 Dynamics disposed of waste at the Ninth Avenue site?

20 A I don't remember at this time.

21 Q Do you know whether Liquid Dynamics disposed
22 of waste at the U.S. Scrap site?

23 A I don't remember at this time.

24 Q Do you remember whether Liquid Waste, Inc.

1 was a generator that disposed of waste at the Ninth Avenue
2 site?

3 A No, they did not.

4 Q Do you know whether Liquid Waste, Inc. was a
5 generator that disposed of waste at the U.S. Scrap site?

6 A No, they did not.

7 Q Do you know whether Lisner was a generator
8 that disposed of waste at the Ninth Avenue site?

9 A No, they did not.

10 Q Do you know whether Lisner was a generator
11 that disposed of waste at the U.S. Scrap site?

12 A No, they did not.

13 Q Do you know whether Luminous Ceiling was a
14 generator that disposed of waste at the Ninth Avenue site?

15 A Yes, they did.

16 Q Do you know whether Luminous Ceilings was a
17 generator that disposed of waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q And from what location did Luminous Ceiling
20 generate wastes that were disposed of at these two sites?

21 A I believe it's 6420 Chestnut Street, in
22 Morton Grove, Illinois.

23 Q And what types of waste did Luminous Ceilings
24 generate that were disposed of at these two sites?

1 A Paint and solvents.

2 Q All right. How often did Luminous Ceilings
3 dispose of waste at these two sites, if you know?

4 A I'm not sure.

5 Q Do you know over what approximate period of
6 time Luminous Ceilings disposed of waste at these sites?

7 A 1973 to 1975 approximately.

8 Q All right. Now, do you know, Mr. Martell,
9 whether Maas and Waldstein was a generator that disposed
10 of waste at the Ninth Avenue site?

11 A Don't remember at this time.

12 Q Do you know whether Maas and Waldstein was a
13 generator that disposed of waste at the U.S. Scrap site?

14 A Don't remember at this time.

15 Q All right. Mr. Martell, do you know whether
16 Marvel Metal disposed of waste at the Ninth Avenue site?

17 A Don't remember at this time.

18 Q Do you know whether Marvel Metal disposed of
19 waste at the U.S. Scrap site?

20 A Don't remember at this time.

21 Q Do you know whether Metal Industry was a
22 generator that disposed of waste at the Ninth Avenue site?

23 A Don't remember at this time.

24 Q Do you know whether Metal Industry disposed

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1 of waste at the U.S. Scrap site?

2 A Don't remember at this time.

3 Q Do you know whether Metal Reclaiming
4 Corporation disposed of waste at the Ninth Avenue site?

5 A Don't remember at this time.

6 Q Do you know whether Metal Reclaiming
7 Corporation was a generator that disposed of waste at the
8 U.S. Scrap site?

9 A Don't remember at this time.

10 Q Do you know whether Midwest Electrics
11 disposed of waste at the Ninth Avenue site?

12 A Yes, they did.

13 Q Do you know whether Midwest Electrics was a
14 generator that disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you know the location where Midwest
17 Electrics generated waste that was disposed of at the two
18 sites?

19 A 1639 West Walnut Street, Chicago, Illinois.

20 Q And do you know what types of waste Midwest
21 Electrics generated that were disposed of at these two
22 sites?

23 A Varnish, oil and solvents.

24 Q And how often did Midwest Electrics dispose

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1 of waste at the two sites?

2 A I'm not sure at this time.

3 Q Or do you know over what approximate period
4 of time Midwest Electrics disposed of waste at the two
5 sites?

6 A 1973 to 1975.

7 Q All right. Mr. Martell, do you know whether
8 Mirror Reflector Service Company disposed of wastes at the
9 Ninth Avenue site?

10 A Don't remember at this time.

11 Q Do you know whether Mirror Reflector Service
12 Company disposed of waste at the U.S. Scrap site?

13 A Don't remember at this time.

14 MS. TIGHE: All right. off the record.

15 (A discussion was held
16 off the record.)

17 MS. TIGHE: On the record.

18 Q Mr. Martell, do you know whether Mobil Oil
19 Company disposed of waste at the Ninth Avenue site?

20 A Yes, they did.

21 Q Do you know whether Mobile Oil also disposed
22 of waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you know the location or locations where

1 Mobile Oil Company generated wastes that were disposed of
2 at the two sites?

3 A Approximately 37 to 3800 South Cicero Avenue,
4 Cicero, Illinois.

5 Q All right. And what types of waste did
6 Mobile Oil generate that were disposed of at the two
7 sites?

8 A Grease.

9 Q How often did Mobile Oil dispose of waste at
10 the two sites?

11 A Twenty to forty drums every two to four
12 months.

13 Q And over what approximate period of time did
14 Mobil Oil dispose of these wastes at the two sites?

15 A 1972 to 1975.

16 Q All right. Mr. Martell, do you know whether
17 Modine Manufacturing Company disposed of wastes at the
18 Ninth Avenue site?

19 A I don't remember at this time.

20 Q Do you know whether Modine Manufacturing
21 Company was a generator that disposed of waste at the U.S.
22 Scrap site?

23 A I don't remember at this time.

24 Q Do you know whether Moffet Tech Center

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1 disposed of waste at the Ninth Avenue site?

2 A I don't remember at this time.

3 Q Do you know whether Moffet Tech Center
4 disposed of waste at the U.S. Scrap site?

5 A I don't remember at this time.

6 MS. TIGHE: Off the record.

7 (A discussion was held
8 off the record.)

9 MS. TIGHE: Back on.

10 Q Mr. Martell, do you know whether National
11 Bronze disposed of waste at the Ninth Avenue site?

12 A Yes, they did.

13 Q And do you know whether National Bronze also
14 disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you know the location where National
17 Bronze generated waste that was disposed of at these two
18 sites?

19 A 9945 Franklin Avenue in Franklin Park,
20 Illinois.

21 Q And what types of waste did National Bronze
22 generate that were disposed of at the two sites?

23 A Acid.

24 Q How often did National Bronze dispose of the

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1 acid wastes at these two sites?

2 A I'm not sure at this time.

3 Q Over what approximate period of time, if you
4 know, did National Bronze dispose of wastes at these
5 sites?

6 A 1973 to 1975.

7 Q All right. Mr. Martell, do you know whether
8 National Celofilm disposed of wastes at the Ninth Avenue
9 site?

10 A I don't remember at this time.

11 Q Do you know whether National Celofilm
12 disposed of waste at the U.S. Scrap site?

13 A I don't remember at this time.

14 MS. TIGHE: All right. Off the record

15 (A discussion was held
16 off the record.)

17 MS. TIGHE: Back on.

18 Q Mr. Martell, we earlier discussed the company
19 National Precision Circuits.

20 Do you know, by any chance, whether
21 National Precision Paint is the same company as National
22 Precision Circuits?

23 A No, I just think it is, but I don't know.

24 Q You don't know for sure?

1 A I don't know for sure, no.

2 Q All right, all right. Mr. Martell, do you
3 know whether Northwest Salvage disposed of waste at the
4 Ninth Avenue site?

5 Off the record.

6 (A discussion was held
7 off the record.)

8 THE WITNESS: No, they didn't.

9 MS. TIGHE: Q Okay. Do you know whether Northwest
10 Salvage disposed of waste at the U.S. Scrap site?

11 A No, they didn't.

12 Q All right.

13 MR. KOWALSKI: Off the record.

14 (A discussion was held
15 off the record.)

16 MS. TIGHE: All right. Back on.

17 MR. KOWALSKI: Back on the record.

18 MS. TIGHE: Q Do you know, Mr. Martell, whether
19 Northwest Screen Print disposed of waste at the Ninth
20 Avenue site?

21 A I don't remember at this time.

22 Q Do you know whether Northwest Screen Print
23 disposed of waste at the U.S. Scrap site?

24 A I don't remember at this time.

1 Q All right. Do you know whether Northwestern
2 University disposed of waste at the Ninth Avenue site?

3 A Don't remember at this time.

4 Q Do you know whether Northwestern University
5 disposed of waste at the U.S. Scrap site?

6 A I don't remember at this time.

7 Q Do you know whether Owens-Illinois disposed
8 of waste at the Ninth Avenue site?

9 A Yes, they did.

10 Q Do you know whether Owens-Illinois disposed
11 of waste at the U.S. Scrap site?

12 A I'm not sure.

13 Q All right. Do you know the location where
14 Owens-Illinois generated wastes that were disposed of at
15 least at the Ninth Avenue site?

16 A 440 East 138th Street, Chicago, Illinois.

17 Q All right. And what types of waste did
18 Owens-Illinois generate that were disposed of at Ninth
19 Avenue?

20 A I don't know.

21 Q All right. What types or do you know how
22 often Owens-Illinois disposed of waste at Ninth Avenue?

23 A There was -- they disposed of one load only
24 that was pumped out from under their truck scale, and that

1 load is about four to five thousand gallons.

2 Q Okay. When, approximately, did that occur,
3 if you know?

4 A About 1973 or 1974.

5 Q All right. Mr. Martell, do you know whether
6 Paisley Products disposed of waste at the Ninth Avenue
7 site?

8 A No, they didn't.

9 Q Do you know whether Paisley Products disposed
10 of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Do you know the location where Paisley
13 Products generated the wastes that were disposed of at
14 U.S. Scrap?

15 A Approximately 17th and Canal Street, Chicago,
16 Illinois.

17 Q And what types of waste did Paisley Products
18 generate that were disposed of at U.S. Scrap?

19 A I believe it was adhesives.

20 Q How often did Paisley Products dispose of
21 wastes at U.S. Scrap, if you know?

22 A I don't remember at this time.

23 Q Over what approximate period of time, if you
24 know, did Paisley Products dispose of waste at U.S. Scrap?

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1 A Some time around 1969 to 1970.

2 Q All right. Mr. Martell, do you know whether
3 Penn-Dixie Steel disposed of wastes at the Ninth Avenue
4 site?

5 MR. KOWALSKI: Off the record.

6 (A discussion was held
7 off the record.)

8 MS. TIGHE: Back on.

9 Q Mr. Martell, did we already cover Penn-Dixie?

10 A I guess we did.

11 Q Let's move on.

12 Mr. Martell, do you know whether Penray
13 disposed of waste at the Ninth Avenue site?

14 A No, they didn't.

15 Q Do you know whether Penray disposed of waste
16 at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you know the location where Penray
19 generated wastes that were disposed of at U.S. Scrap?

20 A 1801 Estes Avenue, Elk Grove Village,
21 Illinois.

22 Q All right. Now, what types of waste did
23 Penray generate that were disposed of at U.S. Scrap?

24 A Some type of chemical.

1 Q How often, if you know, did Penray dispose of
2 waste at U.S. Scrap?

3 A Fifty to sixty drums one time a year.

4 Q And over what approximate period of time did
5 this disposal by Penray occur?

6 A 1969 to 1971.

7 Q All right. Mr. Martell, do you know
8 whether --

9 MR. KOWALSKI: Off the record.

10 (A discussion was held
11 off the record.)

12 MS. TIGHE: Back on.

13 Q Mr. Martell, do you know whether Pauncher
14 Industries or Pauncher Indiana disposed of waste at the
15 Ninth Avenue site?

16 A I don't remember at this time.

17 Q Do you know whether Pauncher Industries or
18 Pauncher Indiana disposed of waste at the U.S. Scrap site?

19 A I don't remember it at this time.

20 MS. TIGHE: Off the record.

21 (A discussion was held
22 off the record.)

23 MS. TIGHE: Q Mr. Martell, do you know whether
24 Preheler Electrical disposed of waste at the Ninth Avenue

1 site?

2 A Yes, they did.

3 Q Do you know whether Preheler Electrical
4 disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Now, do you know the location where Preheler
7 Electrical generated waste does that were disposed of at
8 the two sites?

9 A 2300 North Kilbourn Avenue, Chicago,
10 Illinois.

11 Q And what types of waste did Preheler
12 Electrical generate that were disposed of at these two
13 sites?

14 A Paints, solvents varnishes and oil.

15 Q How often did Preheler Electrical dispose of
16 waste at these sites, if you know?

17 A I'm not sure at this time.

18 Q Do you know over what approximate period of
19 time Preheler Electrical disposed of waste at those sites?

20 A 1973 to 1975.

21 Q Mr. Martell, do you know whether Pyle
22 National disposed of waste at the Ninth Avenue site?

23 A No, I'm not sure at this time.

24 Q Do you know whether Pyle National disposed of

1 waste at the U.S. Scrap site?

2 A I can't remember at this time.

3 Q All right. Mr. Martell, do you know whether
4 Reliable Engineering Service disposed of waste at the
5 U.S. -- at the Ninth Avenue site?

6 A Yes, they did.

7 Q Do you know whether Reliable Engineering
8 Service also disposed of waste at U.S. Scrap?

9 A Yes, they did.

10 Q And do you know the location where Reliable
11 Engineering generated wastes that were disposed of at the
12 two sites?

13 A No. It's in Chicago, but I don't have the
14 exact address.

15 Q Now, what types of waste did Reliable
16 Engineering generate that were disposed of at these two
17 sites?

18 A Paints and solvents.

19 Q How often did Reliable dispose of wastes at
20 those sites?

21 A I don't know at this time.

22 Q Do you know over what approximate period of
23 time Reliable disposed of waste at the two sites?

24 A I think it's 1972 to 1974.

1 MS. TIGHE: All right. Off the record.

2 (A discussion was held
3 off the record.)

4 MS. TIGHE: Q Mr. Martell, do you know whether
5 Reliance Universal disposed of waste at the Ninth Avenue
6 site?

7 A I can't remember at this time.

8 Q Do you know whether Reliance Universal
9 disposed of waste at the U.S. Scrap site?

10 A I don't remember at this time.

11 Q All right. Mr. Martell, do you know whether
12 Rockola Manufacturing disposed of waste at the Ninth
13 Avenue site?

14 A Yes, they did.

15 Q Do you know whether Rockola disposed of waste
16 also at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you know the location where Rockola
19 generated the wastes that were disposed of at the two
20 sites?

21 A 313 South Rohling, Addison, Illinois.

22 Q And what types of waste did Rockola generate
23 that were disposed of at these two sites?

24 A Paints and solvents.

1 Q How often did Rockola dispose of wastes at
2 the two sites, if you know?

3 A I can't remember at this time.

4 Q Do you know what, over what approximate
5 period of time Rockola disposed of wastes at the two
6 sites?

7 A I believe it was 1972 to 1975.

8 Q All right. Now, do you know, Mr. Martell,
9 whether Rohm and Haas disposed of waste at the Ninth
10 Avenue site?

11 A I don't remember at this time.

12 Q Do you know whether Rohm and Haas disposed of
13 waste at the U.S. Scrap site?

14 A I don't remember at this time.

15 Q Do you know whether Role Print Packaging
16 Products was a generator that disposed of waste at the
17 Ninth Avenue site?

18 A I don't remember at this time.

19 Q Do you know whether Role Print Packaging
20 Products disposed of waste at the U.S. Scrap site?

21 A Don't remember at this time

22 Q All right. Do you know whether Samuel G.
23 Keywell disposed of waste at the Ninth Avenue site?

24 A Don't remember at this time.

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1 Q Do you know whether Samuel G. Keywell
2 disposed of waste at the U.S. Scrap site?

3 A Don't remember at this time.

4 Q All right. Mr. Martell, do you know whether
5 St. Charles Manufacturing disposed of waste at the Ninth
6 Avenue site?

7 A I don't know at this time.

8 Q Do you know whether St. Charles Manufacturing
9 disposed of waste at the U.S. Scrap site?

10 A I don't remember at this time.

11 MS. TIGHE: All right.

12 MR. KOWALSKI: Off the record.

13 (A discussion was held
14 off the record.)

15 MS. TIGHE: Q All right. Mr. Martell, earlier we
16 discussed Martinson which, I think, was indicated was
17 associated with or a division of Sherwin Williams.

18 Do you know whether any other location
19 or division of Sherwin Williams disposed of wastes at
20 either the Ninth Avenue or the U.S. Scrap sites?

21 A I don't remember at this time.

22 MS. TIGHE: All right.

23 MR. KOWALSKI: Off the record.

24

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1 (A discussion was held
2 off the record.)

3 MS. TIGHE: All right. Let's see. I'm going to
4 move on.

5 Q All right. Mr. Martell, do you know whether
6 Stenograph Corporation disposed of waste at the Ninth
7 Avenue?

8 A I don't remember at this time.

9 Q Do you know whether Stenograph Corporation
10 disposed of waste at the U.S. Scrap site?

11 A I don't remember at this time.

12 Q All right. Mr. Martell, do you know whether
13 Transport Service disposed of waste at the Ninth Avenue
14 site?

15 A I don't remember at this time.

16 Q Do you know whether Transport Service
17 disposed of waste at the U.S. Scrap site?

18 A I don't remember at this time.

19 MS. TIGHE: All right. Off the record

20 (A discussion was held
21 off the record.)

22 MS. TIGHE: Q All right. Mr. Martell, we
23 discussed Victor Gasket earlier. Do you know whether
24 Victor Products is the same company as Victor Gasket?

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1 A I believe it's the same company.

2 Q All right. Mr. Martell, do you know whether
3 Western Community disposed of waste at the Ninth Avenue
4 site?

5 A No, they didn't.

6 Q Do you know whether Western Community
7 disposed of waste at the U.S. Scrap site?

8 A No, they didn't.

9 MS. TIGHE: All right. Off the record.

10 (A discussion was held
11 off the record.)

12 MS. TIGHE: Q All right. Back on.

13 Q Mr. Martell, do you know whether Young Spring
14 and Wire disposed of waste at the Ninth Avenue site?

15 A No, they didn't.

16 Q Do you know whether Young Spring and Wire
17 disposed of waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q And do you know the location where Young
20 Spring and Wire generated wastes that were disposed of at
21 the two sites --

22 A Young --

23 Q -- or the one site, U.S. Scrap?

24 A Young Seating Division, Gulf and Western

1 Manufacturing Company, 5020 West 73rd Street. And I think
2 that's still Chicago.

3 Q All right. Now, what type of wastes or types
4 of waste did Young Spring and Wire generate that were
5 disposed of at these -- at this U.S. Scrap site?

6 A Oils and chemicals.

7 Q All right. And how often did Young Spring
8 and Wire dispose of waste at U.S. Scrap?

9 A I don't know the volume at this time.

10 Q All right. Over what approximate period of
11 time, if you know, did Young Spring and Wire dispose of
12 waste at U.S. Scrap?

13 A I think it's 1971 to 1972.

14 Q All right. Mr. Martell, we talked earlier
15 today about Rauland Tube, and I think you indicated that
16 was a division or associated with Zenith.

17 Is there any other, any other division
18 or location of Zenith Electronics that generated or
19 disposed of waste at Ninth Avenue or U.S. Scrap that
20 you're aware of?

21 A I don't think so.

22 MS. TIGHE: All right. Now, off the record for
23 just a minute.

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1 (A discussion was held
2 off the record.)

3 EXAMINATION

4 by Mr. Kowalski:

5 Q Mr. Martell, do you know whether any waste
6 from Technical Products was disposed of at the Ninth
7 Avenue site?

8 A I don't remember at this time.

9 Q Do you know whether any waste from Technical
10 Products was ever disposed of at the U.S. Scrap site?

11 A I don't remember at this time.

12 MR. KOWALSKI: Okay.

13 FURTHER EXAMINATION

14 by Ms. Tighe:

15 Q All right. Mr. Martell, do you know
16 whether -- or would it be correct to say that many of the
17 companies that disposed of waste at the U.S. Scrap and
18 Ninth Avenue sites also disposed of wastes at the Midco
19 site in Indiana?

20 A I believe so.

21 MS. TIGHE: All right.

22

23 (Which was all the testimony taken in
24 the above-entitled statement.)

1 STATE OF ILLINOIS)
2) SS:
COUNTY OF C O O K)

3 I, STEVE MARTELL, have read the
4 preceding testimony, consisting of 233 pages, numbered
5 from 1 to 233, inclusive; and the same is a true and
6 correct transcript of said testimony, except as I have
7 made the following alterations or changes in ink and
8 affixed my initials thereto on pages _____
9 _____
10 _____
11 _____
12 _____

Deponent

13 SUBSCRIBED AND SWORN to
14 before me this ____ day
15 of _____, A.D. ____.

16 _____
17 Notary Public
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____
24 _____

CONFIDENTIAL

1 STATE OF ILLINOIS)
2) SS:
COUNTY OF C O O K)

3

4

SUSAN M. SYCHTA and THERESE BALIS

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11

RAPSKI, being first duly sworn, on oath say that they are court reporters doing business in the City of Chicago, that they reported in shorthand the testimony given at the taking of said statement, and that the foregoing is a true and correct transcript of their shorthand notes so taken as aforesaid, and contains all the testimony given at said statement.

12

13

14

15

16

17

And further, that they are not connected by blood or marriage with any of the parties to this action, nor are they a relative or employee of such attorney or counsel, or financially interested in the action or interested directly or indirectly in the matter in controversy.

18

19

20

21

22

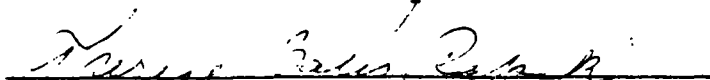
23

24

IN WITNESS WHEREOF, we have hereunto set our hands and affixed our notarial seals this 25th day of May, A.D. 1988.



Susan M. Sychta



Therese Balis Rapski